RCRAInfo CM&E EVALUATION - VIOLATION FORM

*EPA ID I	Number	PAD002498632	. 4.1.144		EIN				
Handler N	lame	Spra-Fin, Inc							
Street	177 Wissahic	kon Ave							
City	North Wales		State	PA	Zip Code	19454			
	Actual Generator Status Check only if different from Notified Status. LQG SQG CESQG Closed Non-Handler								
Universe	Universe Change Required? (Generator Status Change Required) YES NO If YES, complete the Universe Change Section (on reverse side of this form).								
	n-Notifier?	YES NO	If YES, o	complete the Handler Sec	ction (on reverse	side of this form).			
Other Fac	ility Informatio	n Changes? YES	□ NO	If YES, complete the	Handler Section	(on reverse side of this form).			
*EVALU	ATION 🖂	Add Upd	ate [ide an Evaluation Identifier (also Sequence Number).			
*Evalua:	IVDE	Evaluation St (mm/dd/y		*Agency	Responsit Person				
	CEI	8/22/200		S	WAB	VVM			
SNY, and S CSE, FUI,	SNN, otherwise it dei and SNY evaluations	Day Ze or all evaluation types ext faults to Evaluation Start s, you must select a prev on type does not require	Date. For CD vious CEI Stan	F, FUI, I, 8/22/2007	I				
	Notes			SQG Inspection - N	lo Violations				
	Citizen Com	plaint	nedia Insperage Areas (Use Only for Evalua	pling [Not Subtitle C			
		CI	INC [tion-Specific FCI] LDR [] PTB] OTHER (speci Standardized FCI	_				
	CAR C	PC DOS D	EMR [] IEI 🗌 ISI	RTI				
Does this	Evaluation Add	d/Update/Delete a \	/iolation?	YES NO	If Yes, fill in of this form.	the Violations Section(s) on page 2			
Does this	Evaluation link	to a Commitment	?	YES NO		e use the RCRAInfo 3007 Requests and Commitments Form.			
Does this	Evaluation link	to a 3007 Request	:?	YES NO		If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form.			
OUTSTAN	IDING VIOLATION	ONS COVERED BY	ABOVE E	VALUATION? YES [□ NO 🛛 I	If Yes, fill in information below.			
*Seq. No	violation	Type Agency		*Regulation Citate (Type + Citation (ex. FR 262.1)		Date Determined (mm/dd/yyyy)			

*Required Fields

RCRAInfo CM&E Evaluation-Violation Form, Page 2 **EPA ID Number Handler Name** PAD002498632 Spra-Fin, Inc VIOLATIONS SECTION (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form) VIOLATION □ Delete ☐ Add Update Link to Above Evaluation Determined Date Actual RTC Date Violation Return to Compliance (RTC) Seq. No Agency (mm/dd/yyyy) Qualifier (mm/dd/yyyy) Туре A RTC Qualifier is required if entering an Actual RTC Date. Notes: LINK CITATIONS TO ABOVE VIOLATION? If Yes, fill in information below YES NO Citation Citation Citation Citation Туре Type VIOLATION ☐ Add Update Delete Link to Above Evaluation Determined Date Actual RTC Date Violation Return to Compliance (RTC) Seq. No Agency Qualifier Type (mm/dd/yyyy) (mm/dd/yyyy) A RTC Qualifier is required if entering an Actual RTC Date. Notes: LINK CITATIONS TO ABOVE VIOLATION? If Yes, fill in information below YES NO Citation Citation Citation Citation Type Type HANDLER SECTION (Fill out if RCRA Non-Notifier) **Handler Name** Contact Street City State Zip Code County UNIVERSE CHANGE SECTION (Fill out if Universe Change Required) Indicate the Facility's current Universe(s): SQG Indicate the new RCRAInfo Generator Universe: SQG CEG LQG Note: All TSD activity changes must be handled by the IOR and \boxtimes Non-Handler Closed cannot be made using this form. Non-Transporter Transporter If the transporter box is checked, you must check at iii. Indicate the new transporter status: Check non-transporter if the facility is least one mode of transportation below: (Only fill out if the facility requires a currently listed in RCRAInfo as a Air transporter status change) ☐ Water transporter AND no longer transports Rail hazardous waste. Other ☐ Highway

^{*}Required Fields



Inspection Date	8/13/07
Time Start _	
Time Finish _	

HAZARDOUS WASTE INSPECTION REPORT ☐ GENERATOR SQ GENERATOR Facts 1647367

<u></u>				
Company name Spra-Fin, Inc				
EPA I.D. Number PAD002498632 Employer I.D.	r I.D. Number (EIN)			
Site Address 177 Wissahickon Ave, North Wales	<u> </u>			
County Montgomery Municipality Upper Gwynedo	nedd Zip <u>19454</u>			
Name of Inspector Walt Bair, Solid Waste Specialist				
Name & Title of Responsible Official George Chittenden, President				
Person Interviewed	Telephone (<u>215</u>) <u>588-1011</u>			
Mailing Address (if different from above)				
Amount of Hazardous Waste Generated per Month:				
1. Site Characterization:				
STORAGE: Container Tanks Containment Bldg. [Drip Pad Other			
PBR: Neutralization/WWTP Reclaim	Other			
GENERATOR TREATMENT Containers Tanks	☐ Containment Bldg. ☐ Drip Pad			
2. Universal Waste:	ntity Handler			
Universal Waste Types				
3. Hazardous Waste Transporters:				
Transporter Name	License Number			
Transporter Name	License Number			
Transporter Name	License Number			
4. Types of hazardous waste generated and destination facility (le	ocation & type).			
Waste Code Waste Description	Doctination Facility			
Waste Code Waste Description	Destination Facility			

2540-FM-BWM0406 6/2005



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU WASTE MANAGEMENT

Inspection	ID	1647273

Field Code _____

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Site I.D.: PAD002498632 Site Name: Spra-Fin, Inc Address: 177 Wissahickon Ave North Wales, PA 19454 Municipality: Upper Gwynedd Twp. Responsible Official: Person Interviewed: Inspector: Walt Bair eFACTS ID #: PF	Operator Name: Address: County: Montgomery Title: Title: Title: Solid Waste Specialist
	No. of Violations: 0 Time:
Waste Description: Treatment: Yes No Type: Type of Storage: Containers Tanks Piles Disposition: Destination Facility	☐ Impoundments
Location:Amount Generated:	Type:
Treatment: Yes No Type: Type of Storage: Containers Tanks Piles	☐ Impoundments
Disposition: Destination Facility Location: Amount Generated:	Type:
Waste Description:	
Type of Storage: Containers Tanks Piles Disposition: Destination Facility	☐ Impoundments
Location:Amount Generated:	Type:
Waste Description:	
Type of Storage: Containers Tanks Piles Disposition: Destination Facility	☐ Impoundments
	Type:

Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection	August 2	22, 2007	Identification	Number_	PAD002498632
Company/Facility/Site	Name	Spra-Fin,	Inc		

On this date, Solid Waste Specialist Walt Bair and Solid Waste Supervisor Kevin Bauer conducted a hazardous waste generator inspection at this facility. The following observations were made:

- 1) In April 2005, the Department conducted a routine hazardous waste generator inspection at this facility and noted several violations in regards to the storage of hazardous waste. Prior to that inspection, Spra-Fin had ceased operations, failing to properly dispose of hazardous and residual wastes. Due to lack of funding, US EPA contractors performed the remainder of the cleanup and waste disposal. In February 2006, the Department conducted a follow-up inspection and noted several boxes of unused powder coat material deemed to be a residual waste by Spra-Fin officials. Following the February 2006 inspection, a Notice of Violation (NOV) was issued to Spra-Fin noting the following violations:
 - a. Spra-Fin failed to dispose of its containers of waste powder coatings, a residual waste, within one (1) year of generation. This is contrary to 25 Pa Code Section 299.113(a).
 - b. By failing to remove containers of residual waste within one (1) year of its generation, Spra-Fin has, in effect, disposed of residual waste without first obtaining a permit from the Department This is contrary to 25 Pa. Code Section 287.101(a).
- 2) On August 9, 2007, the Department was notified that all waste material had been removed from the site by Hukill Chemical Corporation.
- 3) During today's inspection, a walk around of the site, trailers and building was conducted. All of the waste observed during previous inspections has been removed from this site. A copy of the manifest indicates that Hukill Chemical removed waste from the site on July 23, 2007. The waste was taken to Hukill Chemical Corporation in Bedford, Ohio for disposal. *Thus correcting violations (a) and (b) from above.*
- 4) This facility is no longer in operation and therefore is not a generator of residual or hazardous wastes.

Wastes.	
This inspection report is notice of the findings of an inspection conducted by a representative of Department. This report is formal notification of any violations observed during the inspection.	
Additional notification of viclations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.	
This report does not constitute an order or other appealable action of the Department. Nothing	
contained herein shall be deemed to grant or imply immunity from legal action for any violation noted	
herein.	
Signature by the person interviewed does not necessarily imply concurrence with the findings on th report, but does acknowledge that the person was shown the report or that a copy was left with the person.	
Person interviewed (signature) 4 14 2 Date 8/32/6	2
Inspector (signature)Date	

Page 3 of 3

p	iea	se print or type (Forff designed for use on elite (12-pitch) typewriter.)	, mi				Form	n Approved	OMB No. 3	050-0030
	1	UNIFORM HAZARDOUS I Generator ID Number 2 age	1 of 3. Emergency Re			4. Manifest	Tracking N	3782		
	11	5. Generabo's Name and Mailing Address Spra-Fin, Inc.	(267) 71 Generalbra \$11e A			nap mailing addres	B)	0102		
		Wissahickon Ave.	¥	eei	ahicko	n Ave.				
(contract Hand B320 North Wales, PA 19454-	N	orti	h Wale	es, PA		-		
		6 Transporter Company Name Hukill Chemical Corporation			(U.S. EPAID N HD001926				
		7 Transporter 2 Company Name				US EPAIDN	lumber			
	$\ \cdot\ $	B Designated Facility Name and Sile AddressHukill Chemical Corporati	on			U.S. EPA ID N	lumber			
		7013 Krick Road Bedford, Ohio 44146-				OHD00192	26740			
	ו ו	Facility's Phone. (440)232-9400 Bb. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number,	10	Contain	NOTS.	1 14 7-111	12 1/50			
		and Packing Group (if any))	No.	0.00	Турв	11. Total Quantity	12, Unit Wt Not	13. W	/Bete Codes	
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2		P#18464					1	HCC IDT	78562	
										1
	1	5 GENERATOR'S/OFFEROR'S CERTIFICATION: Thereby declare that the contents of this consigning marked and lebeled/placarded, and are in all respects in proper condition for transport according to a								
	L	Exporter, I certify that the contents of this consignment conform to the lemis of the attached EPA Act I certify that the waste minimization statement identified in 40 CFR 252 27(a) (if I am a large quantity	generator) or (b) (4 i am		li quantity ge	nerator) ia true				
		enerators/Offerors Photed/Typed Name	Signature C	1/				Month	ا Day الرحم ا	Year O'7
INT'E	1	6 Interneuonal SNpments mporto U.S. Export	rom U.S. Po	n of ent	ry/exf					
_	_	rensporter signature (for exports only) 7. Transporter Acknowledgment of Receipt of Materials	Da Da	o leavir	ng U.S.:	4				
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TO ANCHORTED		ransportal 2 Printed Typad Name	Signature					Monu	h Day	Year
1	_	8. Discrepency		_						l
	1	8s. Discrepancy Indication Space Quantity	Residu	e		Partiel Reje	ection		Full Rejec	nion
			Manifest Re	erançe	Number					
71.11.74.2		8b. Allemete Facility (or Generator)				U S EPA ID N	lumber			
50		aciny's Phone:				1		142		
ATE		Bo Bignature of Allamata Facility (or Generator)						Mon	th Day	Year
DECICATED		Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, dis	posal, and recycling sys	8m6)		14.				
1	1	H141 (H141	3.							
	2 F	Design sted Facility Owner or Operator Certification of receipt of hazardous malarisis covered by the refused typed Name	manifest execut as noted	in Ilen	T-01			Mon	n Day	Year
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Street	177	Wissah		Au	<u> </u>					
City	North	Waks	State		PA	Zip Co	de	194	154	
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Universe (Generator	Change Require Status Change Re	ed? equired) YES] иоД	∦YES, α	mplete the	Universe Cha	nge Section	on revers	e side of thi	s form).
	n-Notifier?		If YES	complete th	e Handler S	Section (on rev	erse side o	f this form)		
Other Fac	ility Information	Changes? YES	S NC) X If YES	, complete t	he Handler Se	ection (on re	everse side	of this form).
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Does this E	Does this Evaluation Add/Update/Delete a Violation? YES NO If Yes, fill in the Violations Section(s) on page 2							age 2		
Does this E	Does this Evaluation link to a Commitment? YES NO If Yes, please use the RCRAInfo 3007 Information Requests and Commitments Form						Form.			
Does this E	valuation link to	a 3007 Request?		YES 🔲	ио 🔀	If Yes, plea	se use the	RCRAInfe		
DUTSTAND	ING VIOLATION	S COVERED BY	ABOVE EV	'ALUATIO	N? YES				mation be	

Does this Evaluation link to a 3007 Request?

YES NO I If Yes, please use the RCRAIND SUM Information Requests and Commitments Form.

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? YES NO I If Yes, fill in information below.

*Regulation Citation (Type + Citation) (mm/dd/yyyy)

(ex. FR 262.1)

*Date Determined (mm/dd/yyyy)

*Required Fields

SC filled in rul section

1P

RCRAInfo CM&E Evaluation-Violation Form, Page 2 **EPA ID Number** Handler Name PAD002498632 Inc Fine VIOLATIONS SECTION (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form) √Update Delete Link to Above Evaluation VIOLATION Add Violation Determined Date Return to Compliance (RTC) Actual RTC Date Agency Seq. No (mm/dd/yyyy) Type Qualifier (mm/dd/yyyy) A RTC Qualifier is required if 260.A 2/10/06 entering an Actual RTC Date. Notes: LINK CITATIONS TO ABOVE VIOLATION? YES 🗆 NO 🖾 if Yes, fill in information below Citation Citation Citation Citation Type Type VIOLATION Add Delete Update Link to Above Evaluation Determined Date Return to Compliance (RTC) Actual RTC Date Violation Seq. No Agency (mm/dd/yyyy) (mm/dd/yyyy) Type Qualifier A RTC Qualifier is required if 110100 ପ୍ରପ entering an Actual RTC Date. Notes: LINK CITATIONS TO ABOVE VIOLATION? YES 🗆 NO 🔯 If Yes, fill in information below Citation Citation Citation Citation Type Type HANDLER SECTION (Fill out if RCRA Non-Notifier) Contact **Handler Name** Street State Zip Code City County UNIVERSE CHANGE SECTION (Fill out if Universe Change Required) Indicate the Facility's current Universe(s): Indicate the new RCRAInfo Generator Universe: sog 🗀 CEG LQG 🗆 Note: All TSD activity changes must be handled by the IOR and Non-Handler Closed cannot be made using this form. Non-Transporter Transporter | If the transporter box is checked, you must check at iii. Indicate the new transporter status: Check non-transporter if the facility is least one mode of transportation below: (Only fill out if the facility requires a currently listed in RCRAInfo as a □ Air transporter status change) transporter AND no longer transports □Water □ Rail hazardous waste. □ Other ☐ Highway

^{*}Required Fields

February 2006

RCRAINFO CM&E ADDITIONAL VIOLATIONS FORM (Attach to RCRAInfo CM&E Evaluation – Violation Form, if appropriate)							
EPA ID Number	Handler Name						
PAD000498632	Spra-Fing I	ns					
VIOLATION Add VUp	date Delete		Link to Above Evaluation Ϋ				
Seq. No Violation Type Agence 260 A	Determined Date (mm/dd/yyyy)	Return to Complia Qualified A RTC Qualifier entering an Actua	r (mm/dd/yyyy) is required if				
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Citation Cita Type	tion	Citation Type	Citation				
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LINK CITATIONS TO ABOVE VIOL	ATION? YES	NO 🖺	If Yes, fill in information below				
Citation Citat	ion	Citation Type	Citation				

February 2006

RCRAINFO CM&E ADDITIONAL VIOLATIONS FORM (Attach to RCRAInfo CM&E Evaluation – Violation Form, if appropriate)							
EPA ID Number	Handler Name						
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VIOLATION Add XUp	date Delete		Link to Above Evaluation				
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LINK CITATIONS TO ABOVE VIOL	ATION? YES	NO .	If Yes, fill in information below				
Citation Citati	ion	Citation Type	Citation				

February 2006

RCRAINFO CM&E ADDITIONAL VIOLATIONS FORM (Attach to RCRAInfo CM&E Evaluation – Violation Form, if appropriate)						
EPA ID Number	Handler Name					
PAD602498632	Spra- Fin	Inc.				
VIOLATION Add XU	odate Delete		Link to Above Evaluation			
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LINK CITATIONS TO ABOVE VIO	LATION? YES	NO .	If Yes, fill in information below			
Citation Citat	tion	Citation Type	Citation			



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	ΕΕ	VALUATION	IV – NC	OLATION	FORM	
*EPA ID Number	PADO	3249863	12	EI	N	
Handler Name	Spra	-Fib, I	nc.			
*Street 17		2 hickon	Aux.			
*City Non	th Wale	٤٠ ا	State	PA	*Zip Code	19454
Actual Generator St Check only if different fro		LQG 🗌 SQ	G 🗌 CES	QG Closed	☐ Non-Ha	ndler
Generator Status Cha	ange Required?	YES NO form).	If YES	s, complete the Ge	nerator Status (Change Section (on reverse side of this
RCRA Non-Notifier?		YES NO	If YES	complete the Ha	ndler Section (c	on reverse side of this form).
Other Facility Inform	ation Changes	YES NO	If YES	s, complete the Ha	ndler Section (c	on reverse side of this form).
*EVALUATION	Add 🔀 (Change	Delete [
Type CE SNY Check only if making a do not fill in the Evaluation	SNN SNC determination	2006	Agency Comments: Seq No.:	*Respon Perso	on	Branch Waste
VIOLATION Add		☐ Delete			Liz	nk to Above Evaluation?
*Agency Area *Regulation Type *Regulation Citation						
S .	7 FR		40 CF1	26211		
*Date Determin (mm/dd/yyyy)	Kra	nch *Per	rson	Return to Com Qual	ifier	(mm/dd/yyyy)
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5	8 F	R	40 C	FR 242.	34 (a) ('4)
*Date Determin (mm/dd/yyyy	H/2	inch *Pe	rson	Return to Com		C) RTC Actual Date (mm/dd/yyyy)
4/14/2005	5			A RTC Qua entering a	alifier is require RTC Actual Da	dif 2/10/2006
Comments:	waste ne	moved b	x late	2005		Seq. No.
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Comments:	Va	ste nemou	10.			Seq. No.:

EPA ID Number PAD	062498632	Handler Name	Spra- Fin, Inc.
VIOLATION Add 🔀 CI	hange 🗌 🛮 Delete 🔲		Link to Above Evaluation?
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ς	FR 4	0 CFR 265	. 173(b)
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VIOLATION Add 🛛 C	hange 🗌 Delete 🔲		Link to Above Evaluation?
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7-17-3		entenng a	
Comments:	to see he mo	wy d —	Seq. No.:
OUTSTANDING VIOLATION		E EVALUATION? (Y	(N) If Yes, fill in information below
Seq No.	Regulation Citation (Type + Citation) (ex., FR 262.1)	*Agency	*Area *Date Determined (mm/dd/yyyy)
HANDLE	R SECTION (Must be C	Completed if Handle	r is a RCRA Non-Notifier)
Handler Name			
Contact			
Street			
City		State	Zip Code
County			
			enerator Status Change is Required)
	fied RCRAInfo Generator S	T	
ii. Indicate the Actual Gene Note: Facilities who are required to Notification Form		LQC Non-Handle	
iii. Indicate the New	Trans	porter	Non-Transporter
Transporter Status: (Fill out only if the facility requires transporter status change)	If the transporter box is least one mode of transp	checked, you must check portation below:	Check non-transporter if the facility is currently list in RCRAInfo as a transporter AND no longer transports hazardous waste.
	Air W	Vater	





	Additional VIOLATIONS (Attach to Evaluation – Violation Form)					
EPA ID Number	Handler Na					
PAD 0.02498632	Spra- Fin, Inc.					
VIOLATION Add ⊠ Change	☐ Delete ☐	Link to Above Evaluation?				
Agency Area Regul	lation Type Regulation	Citation				
S 9 F1	2 40 CFR 262.34 ((C) (À				
Date Determined (mm/dd/yyyy)	anch Person Return to Compliance (I Qualifier	RTC) RTC Actual Date (mm/dd/yyyy)				
	A RTC Qualifier is requentering a RTC Actual	uired if \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \				
Comments: Accumulation	in date determined; washe pen	Seq. No:				
VIOLATION Add ⊠ Change	☐ Delete ☐	Link to Above Evaluation?				
Agency Area Regul	lation Type Regulation	Citation				
S 16 F	R 40 CFR 242.34 (a)	(3)				
Date Determined Bra	anch Person Return to Compliance (i Qualifier	RTC) RTC Actual Date (mm/dd/yyyy)				
4/14/2005	A RTC Qualifier is req entering a RTC Actua	uired if				
Comments: Label alla	ently waste namoused	Seq. No:				
VIOLATION Add ☑ Change	Delete 🗌	Link to Above Evaluation?				
Agency Area Regu	lation Type Regulation	Citation				
	CC CLIMA COLD wood	6 i N				
	SS SWMA 6018,4036	(6)				
Date Determined (mm/dd/yyyy) Bri	anch Person Return to Compliance (Qualifier	RTC) RTC Actual Date				
Date Determined (mm/dd/yyyy) 4/14/2005	Return to Compliance (RTC) RTC Actual Date (mm/dd/yyyy)				
(mm/dd/yyyy)	A RTC Qualifier A RTC Qualifier is requested and a RTC Actual and a RTC A	RTC) RTC Actual Date (mm/dd/yyyy)				
(mm/dd/yyyy) 4/14/2005 Comments: 1/001	Return to Compliance (Qualifier A RTC Qualifier is req entering a RTC Actual A March of the content of the c	RTC) RTC Actual Date (mm/dd/yyyy) suired if at Date.				
(mm/dd/yyyy) 4 / 14 / 2 0 0 5 Comments: ₩aste 6€ VIOLATION Add 🖾 Change	Return to Compliance (Qualifier A RTC Qualifier is req entering a RTC Actual A March of the content of the c	RTC Actual Date (mm/dd/yyyy) suired if				
(mm/dd/yyyy) 4 / 14 / 2 0 0 5 Comments: Waste 1 d€ VIOLATION Add ⊠ Change	Return to Compliance (Qualifier A RTC Qualifier is req entering a RTC Actual Delete Delete Regulation	RTC Actual Date (mm/dd/yyyy) suired if				
(mm/dd/yyyy) 4/14/2005 Comments: Washe Washe VIOLATION Add Change Agency Area Regul	Return to Compliance (Qualifier A RTC Qualifier is req entering a RTC Actual Delete Delete Regulation	RTC Actual Date (mm/dd/yyyy) Seq. No: 10 Link to Above Evaluation? Citation				
(mm/dd/yyyy) 4 / 14 / 2 0 0 5 Comments: Was to the second secon	Return to Compliance (Qualifier A RTC Qualifier is requentering a RTC Actual Delete Paragraph Return to Compliance (Qualifier is requentering a RTC Actual A RTC A RT	RTC Actual Date (mm/dd/yyyy) Seq. No: Link to Above Evaluation? Citation RTC Actual Date (mm/dd/yyyy) RTC Actual Date (mm/dd/yyyy)				

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2500-FM-BWM0276	6/2005

nspection Date <u>Feb</u>	10 2006
Time Start	

CFACTS 1521636	LIA	Time Finish
HAZARDOUS WASTE	INSPECTION REPORT	
GENERATOR	S Q GENERATO	OR

	G	ENERATOR	X SQGE	NEKATUK	
Com	npany name	pra-Fin. I	ne.		
ΞΡΑ	I.D. Number PAT	0 002498633	L Employer I.D. Numb	er (EIN)	
Site	Address 177 \	Wiccalacton	Aug North	Walso PA	1
Cou	nty Montgone	ry Municipa	lity Uppen Chyna eas e Chittender	dd Tup Zip 1	7454
Nam	ne of Inspector	Charles F	eas		
Nam	ne & Title of Responsible	e Official	e Chittender	Presiden	+
Pers	son interviewed		I (elephone (~ / >)	וויין דינקנד
Mail	ing Address (if different	from above)			
Amo	ount of Hazardous Wast	e Generated per Month:	hot Poi	unds	Kgs
1.	Site Characterization:	C	hot Pol		
	STORAGE: 🔀 Conta	ainer 🗌 Tanks 🔲 (Containment Bldg. 🔲 Drip	Pad Other	
	PBR: Neuti	ralization/WWTP 🔲 I	Reclaim	Other	
	GENERATOR TREATM	∕IENT ☐ Containers	☐ Tanks ☐	Containment Bldg.	☐ Drip Pad
2.	Universal Waste:	Large Quantity Handler	Small Quantity H	andler	
	Universal Waste Ty	/pes			
3.	Hazardous Waste Trai	nsporters:			
	Transporter Name		L	icense Number	
	Transporter Name		L	icense Number	
	Transporter Name		L	icense Number	
4.	Types of hazardous w	aste generated and de	estination facility (location	on & type).	
	Waste Code	Wasta F	Description	Destination	Facility
	waste code	Waste D	rescription	Destination	racinty
		<i>(</i> 0)			
		- Clean v	p ongoing -		
			<i>V V</i>		
		<u> </u>			

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name	Spra-Fin	ID Number		Date _	2-10-2006
	1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non	Compliance

STATUS

_;	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
				Identification Number	262a.10	262.12	H002
1	1			Authorized transporters only	262a.10	262.12(c)	H003
+	1			Subsequent notification requirements met	262a.12(b)		H004
,				Proper manifest used	262a.10	262.21	H005
	+			Manifests filled out correctly and completely	262a.20		H006
+	1			Manifests signed and routed properly	262a.23(a)	262.23	H007
+				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
+	1			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
1				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
(Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H01:
(Specified records retained for three years	262a.10	262.40(c)	H014
(Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H01
				Exception reporting procedures followed	262a.42	262.42	H01
,		-		Spill reporting procedures followed	262a.10	262.34(d)	H01
+				PPC plan developed and implemented	262a.10	262.34(a)	H01
	χ			Special requirements followed for international shipments	262a.10	262.50 262.60	H01
	<i>1</i>)			Source reduction strategy prepared and available (LQG only)	262a.100		H02
(Excluded waste complies with exclusionary requirements	261a.4	261.4	H02
•							

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name	Spra-Fin	ID Number		Date	2-102006	
	1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Co	ompliance	

STATUS FED CIT. LINE PA CIT. 40 CFR 1 2 3 4 REQUIREMENT 25 PA Code NO. **CONTAINERS** (Subchapter I) 262.34 H025 Containers managed in compliance with 40 CFR Part 265 262a.10 Subpart I and 25 PA Code Chapter 265a Subchapter I 265.171 H026 Containers of hazardous waste in good condition 265a.1 Containers and stored waste compatible 265a.1 265.172 H027 H028 265a.1 265.173(a) Containers kept closed except during addition or removal of wastes Containers managed to prevent leaks 265a.1 H029 265.173(b) Container configuration and spacing insures safe management 265a.173 H030 and access for inspection purposes and emergency equipment Container storage areas inspected at least weekly 265a.1 265.174 H031 Special requirements for ignitable or reactive and incompatible 265.176-177 H032 265a.1 waste complied with Proper containment and collection systems in place 265a.179 H033 Air emission standards complied with (AA, BB, CC) 265a.1 265,178 H034 H035 Containers clearly marked with accumulation date and visible for 262a.10 262.34(a)(2) inspection Containers labeled "Hazardous Waste" H036 262a.10 262.34(a)(3) H037 Containers labeled accurately identify contents SWMA 6018.403(b) (2)



Inspection ID	1521638
Field Code	

INSPECTION REPORT – RESIDUAL WASTE GENERATOR	
Inspector: Charles Fees Title: Sws eFACTS ID#: PF SF Inspection Date: 2/10/2006 Type: No. of Violations: —1— Time	e:
Waste Description: Waste Do Warn Coat Waste Code:	
Treatment: Yes No Type:	
Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ Impoundments	
Disposition: Destination Facility Not Yet Disposition	
Location:Type:	i
Amount Generated: lb./mo.	
Waste Description: Waste Code: Treatment: Yes No Type: Type of Storage: Containers Tanks Piles Impoundments Disposition: Destination Facility	
Location: Type:	
Amount Generated: lb./mo.	
Waste Description: Waste Code:	
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles Impoundments	
Disposition: Destination Facility	
Location: Type:	
Amount Generated: lb./mo.	
Waste Description: Waste Code:	
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles Impoundments	
Disposition: Destination Facility	
Location: Type:	
Amount Generated: lb./mo.	
	Page 1 10f <u>Ĵ</u>

☐ White - Operator

☐ Yellow - Regional Copy



Site Name	Spra-Fin. Inc.
ID Number	J
Date	2-10-2004

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

	STA	TUS	13.1			CHAPTER	LINE
1	2	3	4	GENERAL REQUIREMENTS COMME		CITATION	ITEM
X				Designated facility: valid permit? Permit Number (PA)		287.6	1
X				Biennial report submitted by March 1 of each odd numbered year.		287.52(a)	2
X				Written source reduction strategy on file and in effect.		287.53	3
X				Waste reduction strategy covers all waste streams.		287.53(b)	4
风				Reduction strategy updated every five years or when waste or manufacturing process changes.		287.53(c)	5
X				Waste analysis performed: copy on file.		287.54	6
Ø				Annual analysis or certification of waste submitted to Department and designated facility.		287.54(b)(f)	7
区				Chemical analysis updated every five years or when waste or manufacturing process changes.		287.54(g)	8
X				Generator record keeping requirements.		287.55	9
				Operation of disposal or processing facility without a permit.		287.101(a)	10
				STORAGE REQUIREMENTS			
X				Residual waste not mixed with hazardous waste.		299.111(1)	11
V				Waste stored as not to create a safety risk.	T	299.111(2)	12
V				Residual waste not mixed with special handling waste.		299.111(3)	13
X				Waste not blown or otherwise deposited outside storage area.	T	299.111(4)	14
X				Storage area inspected; records available.	Ħ	299.112(c)	15
X				All waste stored less than one year.	Ħ	299.113(a)	16
X				Equipment maintained in operable condition.	Ħ	299.114(a)	17
		1	一	Equipment cleaning frequencies maintained.	Ħ	299.114(c)	18
X				Vectors controlled and minimized.	Ħ	299.115	19
X				Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.		299.116(a)(b)	20
X				Waste stored to prevent groundwater degradation.	П	299.116(c)	21
区				Sufficient number of properly constructed storage containers.	Ħ	299.121	22
区	忊			Storage containers labeled properly.	Ħ	299.121(d)	23
図	情		1	Storage container height and access requirements.	H	299.121(e)	24
囡	十一		一	Storage tank design standards.	+	299.122	25
岗	怈	HH	H	Storage tanks labeled properly.	+	299.122(a)	26
-		<u> </u>	1-		<u> </u>	299.112(d),	
	X	-		No putrescible waste or liquid waste stored in piles.		299.131(b)	27
	□			Waste storage pile area properly designed, constructed and maintained.		299.131	28
	X			Storage pad or liner system properly designed and maintained.		299.132	29
Ш	□ ×	-		Proper design and maintenance of leachate and runoff control systems.		299.133	30
	X	_		Proper storage and containment of incinerator ash residue.		299.151	31
				Proper storage and containment of friable asbestos containing waste.		299.152	32
				Proper storage and containment of coal ash.		299.153	33
	X			Proper storage and containment of PCB containing waste material.		299.154	34
	X			Proper storage of whole and processed tires.		299.155	35
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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection	2-10-2006	ldentif	cation Number _	PAD 00	2498632
Company/Facility/Site	Name S	pra-Fin, Inc.			
Introduction					
On this date, Charlie For inspection. George Ch		dolski of the PA DEP cond	lucted a hazardou	s and res	idual waste generator
Background					
original inspection of 4 wastes. I saw several h	4-14-2005. Inspection nundred containers (va	customer parts, had ceased showed that this company arious sizes) of hazardous a section of 4-14-2005 was p	failed to dispose and non-hazardou	of its ha	zardous and residual in the form of powder
The Department issued Chittenden, President,		n ('NOV") to Spra-Fin, Incaining officer.	c. May 24, 2005.	The NO	V was issued to George
		mpleted only approximate clean up and waste remova		cleanup.	The EPA, thru its
Inspection, 2-10-2006	i				
During today's inspect wastes first observed of		of the wastes have been roof 4-14-2005:	emoved from the	site. Thi	s included the following
the railroad tracks i b) Approximately 50 c) Approximately 10 diethylene glucol b	n back of the building containers of similar r containers of unused c utyl ether, stored insic	naterials, stored in a trailer chemicals, including a mix	r in front of, and t ture of hydrofluor	o the eas	t, of the building. phosphoric acid, and
notification of any violation herein, or other violations id This report does imply immunity from legal a	is observed during the ins lentified as a result of review not constitute an order or o ction for any violation noted person interviewed does n	ot necessarily imply concurrence	of violations may be rtment records. partment. Nothing co	issued co	rein shall be deemed to grant or , but does acknowledge that the
Person interviewed (nailed		Date	3-15-2006
Inspector (signature	Lava J.	The same of the sa		_ Date	3-10-2000
	•				Page <u>V</u> 2 of <u>7</u>

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection	2-10-2006		Identification Number	PAD 002	2498632
Company/Facility/Site N	lameS	pra-Fin, Inc.			
(Inspection, continued)				
However, we saw waste a located in a storage traile	-		(10) boxes of unused power	ler coat ma	aterial. This waste was
•	, located in Red Hil	ll, Montgomery C	iginally scheduled to be trace	-	
Mr. Chittenden was not a former Spra-Fin Compar	•	y when he could	remove this last remaining	g powder c	oat waste from the
Conclusion					
4-14-2005 (see next page	e). However, this c	ompany remains	nal waste violations observin violation of the following of at a permitted disposa	ng regulati	-
25 PA Code 287.101(a)	"Disposal of Resi	idual Waste with	out a permit"		
We discussed the results	of this inspection	with George Chit	tenden prior to our departu	ıre.	
Note: George Chittende	n said that he accep	ots correspondence	ce at the following address	:	
	P.C Re	eorge Chittenden O. Box 141 ed Hill, PA 18076 15) 588-1011	j.		
notification of any violations herein, or other violations ider This report does no imply immunity from legal acti	observed during the instiffied as a result of reviet toonstitute an order or on for any violation noteerson interviewed does not that a copy was left were to the copy was left were than the copy was left were than the copy was left were considered.	spection. Additional ew of laboratory analy other appealable action and herein. not necessarily imply ith the person.	n conducted by a representative notification of violations may be uses or Department records. On of the Department. Nothing concurrence with the findings of the Department of the findings of the Department of the Department.	e issued cor contained her	ein shall be deemed to grant o

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

		INSPECTION REI	PORT COMMENTS		
Date of inspection	2-10-2006	6	Identification Number _	PAD 00	02498632
Company/Facility/Sit	e Name	Spra-Fin, Inc.			
Addendum					
			he fact that all of the hazardo yed on 4-14-2005, are now co		
25 PA Code 299.113(25 PA Code 299.121("Generator ("Preparedne "Containers "Containers "Containers "Containers "Containers "All residuad) "Containers Manifest used or storage fa	ess, prevention, and constant and constant and constant areas inspected a marked with an accuma selected to accurately all waste stored less that is of residual waste laborated document the transparence.	I weekly" nulation date" aste'." identify contents" in 1 year" eled properly" portation of hazardous waste	ed and i	
The following violation	on is still outsta	anding:			
25 PA Code 287.101	(a) "Disposal	of Residual Waste with	hout a permit"		
It is recommended that to accept this waste.	at Spra-Fin rem	nove its waste powder o	coating, and dispose of the wa	aste at a	facility that is permitted
notification of any violatio herein, or other violations i This report does imply immunity from legal	ns observed during dentified as a resure not constitute and action for any violate person interviewed ort or that a copy was (signature)	ng the inspection. Additionally of review of laboratory and order or other appealable action noted herein. ed does not necessarily imp	ion conducted by a representative al notification of violations may be alyses or Department records. In order to the Department. Nothing concurrence with the findings on the Landau and the concurrence with the findings on	issued co	erein shall be deemed to grant or t, but does acknowledge that the
specioi (aigilature		The same of the sa			Page <u>8</u> of <u>9</u>

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection	2-10-2006		Identification Number	PAD 002498632	
Company/Facility/Site I	Name	Spra-Fin, Inc.			





Spra-Fin: Powder Coat Waste

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)	mailed	Date	3-15-2004
Person interviewed (signature)		Date	2-10-2006
			Page 9 of 9



U.S. Environmental Protection Agency **Resource Conservation and Recovery Act** (RCRAInfo)

Recent Additions | Contact Us | Print Version EF Search: GO

EPA Home > Envirofacts > RCRAInfo > Query Results





Consolidated facility information (from multiple EPA systems) was searched to select facilities

Handler ID: Beginning With: pad002498632

Results are based on data extracted on FEB-12-2006

Note: Click on the underlined CORPORATE LINK value for links to that company's environmental web pages. Click on the underlined MAPPING INFO value to obtain mapping information for the facility.

Go To Bottom Of The Page

HANDLER NAME: SPRA FIN INC

HANDLER ID:

PAD002498632

STREET:

CITY:

RCRAInto

177 WISSAHICKON AVE FACILITY INFORMATION: View Facility Information NORTH WALES

CORPORATE LINK:

No

STATE:

PA

COUNTY:

MONTGOMERY

ZIP CODE:

194540000

MAPPING INFO:

MAP

EPA REGION:

CONTACT INFORMATION

NAME	STREET	CITY	STATE	ZIP CODE	PHONE	TYPE OF CONTACT
JERRY MASCARO	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	NORTH WALES	PA	19454	2156999238	Public

HANDLER / FACILITY CLASSIFICATION

HANDL	ER	TYP	E
Small C	en	erato	r

Go To Top Of The Page

Total Number of Facilities Displayed: 1

RCRAInfo CM&E EVALUATION – VIOLATION FORM

*EPA ID Numb	er	PAD	002498632	2				EIN			
Handler Name		Spra-	Fin, Inc.								
Street 177	' Wissahicl	on Av	е								
City Nor	th Wales			State	PA			Zip Code	194	54	
Actual Genera		atifical C	totus	LQG 🗌	SQG [CES	QG 🗆 C	losed	I ☐ Non-Handler ☐	
Check only if diffe				1 171							
(Generator Statu	s Change Re	equired)	YES _	NO 🔯						on reverse side of this form).	
RCRA Non-No		YE						on (on reverse si			
Other Facility			ges? YES	S NO	✓ If YE	S, comple				rerse side of this form).	
*EVALUATIO	N 🗵	Add	Up	date	_ Dele	ete		ou must provid nown as the Se		Evaluation Identifier (alsonce Number).	0
*Evaluation Identifier	*Туре	\$\frac{\pi}{2} \tag{*}	Evaluation S (mm/dd/)		*Ag	gency		Responsibl Person	le	Suborganization	
001	SNÝ		11/18/2	005		S		CJF		WM	
SNY, and SNN, o CSE, FUI, and SN	Pay Zero (mm/dd/yyyy): You need to specify Day Zero for all evaluation types except CDI, CSE, FUI, SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CDI, CSE, FUI, and SNY evaluations, you must select a previous CEI Start Date for the Day Zero. Reclassified SV Date: Only applicable for SNY evaluation type as appropriate.										
	Notes:					clean-u	ıp onge	oing			
			Evalua	ation Indica	or Field	(Check a	II that	 apply)			
c	itizen Comp	olaint	☐ Multi	imedia Inspe	ection		Samp	ling 🗆	Not	Subtitle C	
		Fo	cused Cove	erage Areas	(Use On	ly for Ev	aluati	on Type FCI)			
5,1		o. □	0EL E			cific FCI	D.T.D.				
BIF	_		CFI [_	☐ LDF	R ∐ OTHER (s	PTB	D PTX			
	". Ш		001 _			dized FCI		<i>'</i> -		-	
CAF	R 🗆 CF	c 🗆	DOS [] EMR [] IE	:I 🔲	ISI	RTI			
Does this Eval	uation Add	/Updat	te/Delete a	Violation?	YES	Пио		If Yes, fill in ti	he Vio	lations Section(s) on page 2	
Does this Eval					-			of this form.	use t	he RCRAInfo 3007	_
					YES			Information R	Reques	sts and Commitments Form. he RCRAInfo 3007	1
Does this Eval					YES			Information R	Reques	sts and Commitments Form.	
OUTSTANDING	G VIOLATIO	ONS CO	OVERED B	Y ABOVE E					Yes,	fill in information below.	
*Seq. No.	*Violation	Туре	*Agency		(T)	gulation (ype + Cit (ex. FR 26	ation)			*Date Determined (mm/dd/yyyy)	
006	262.A		S			FR 265.1	174			4/14/2005]
007	262.A	\	S			FR 262.	11			4/14/2005	
009	262.0	;	s		FR	R 262.34	(A)(2)			4/14/2005	
010	262.0	;	S		SS	6018.4	03(B)			4/14/2005	
011	262.A	\	S			SR 262A	.20			4/14/2005	

			*Regulation Citation	*Date Determined
*Seq. No.	*Violation Type	*Agency	(Type + Citation) (ex. FR 262.1)	(mm/dd/yyyy)
012	262.A	s	FR 265.173(B)	4/14/2005
014	262.A	S	FR 262.34(A)	4/14/2005
016	262.A	S	FR 262.34(A)(1)	4/14/2005
9/	261.6	5	26L. Lu a	xlssl6
8	264.9	5		VIMIDS

^{*}Required Fields





EPA

West to			TOURIS AND WAS I	- MANAGEMENT	
	E	VALUATION	- VIOLATIO	N FORM	
*EPA ID Number		202 498 C	32	EIN	
Handler Name	Spra-	Fig. Inc.	MARK - IN MARK A HARRIST BANKS THE ST		e discipii - repailment discipii di a si 1900 di 1900
*Street 17		ichickes A	J € -		proc. 10.1. proc.
*City Nont	h Wales	*State	PA	*Zip Code	19454
Actual Generator Sta Check only if different from		LQG ☐ SQG ☐	CESQG [Clo	sed Non-Ha	andler 🗌 HW Transporter 🗌
Generator Status Cha	inge Required?	YES NO No form).	If YES, complete th	e Generator Status	Change Section (on reverse side of this
RCRA Non-Notifier?		YES NO	If YES, complete th	e Handler Section (on reverse side of this form).
Other Facility Informa	ition Changes	YES NO	If YES, complete th	e Handler Section ((on reverse side of this form).
*EVALUATION Add Change Delete					
*Type *Date (mm/dd/yyyy) *Agency *Responsible Person Branch / 8/2005 State CSF. Waste WM SNY SNN Comments: Cleam-up On-going Check pally if making a SNC determination. If checked, do not fill in the Evaluation Type field. Seq No.:					
VIOLATION Add Change Delete Link to Above Evaluation?					
*Agency Are	a *Regul	ation Type		*Regulation C	itation
*Date Determine	ed Bra	nch *Person	Return to	Compliance (RT)	C) BTC Actual Date
(mm/dd/yyyy)	Dra .	nen Person	7 [Qualifier Qualifier is require	(mm/dd/yyyy)
				ng a RTC Actual De	
Comments:					Seq. No.:
VIOLATION Add	Change	☐ Delete ☐		L	ink to Above Evaluation?
*Аделсу Аге	a *Regu	ation Type		*Regulation C	itation
*Date Determine (mm/dd/yyyy)	ed Bra	nch *Person	ARTO	Compliance (RT Qualifier Qualifier is require ing a RTC Actual Da	(mm/dd/yyyy) ed if
Comments:					Seq. No.:
VIOLATION Add	☐ Change	☐ Delete ☐		L	ink to Above Evaluation?
*Agency Arc	ea Regu	lation Type		*Regulation C	Citation
*Date Determine (mm/dd/yyyy)		inch *Person		Compliance (RT Qualifier	(mm/dd/yyyy)
				C Qualifier is requir ing a RTC Actual D	
Comments:					Seq. No.:

EPA ID Number PAD 0	02498632	Handler Name	Spra-	Fin, Inc.			
VIOLATION Add 💢 Chai	nge 🗌 Delete 🔲			Above Evaluation?			
`Agency Area "Re	egulation Type	*Reg	ulation Citation				
*Date Determined (mm/dd/yyyy)	Branch *Person	Return to Compli	e r	RTC Actual Date (mm/dd/yyyy)			
		entenng a RTC	er is required if C Actual Date.				
Comments:				Seq. No.:			
VIOLATION Add Cha	nge 🗌 Delete 🔲		Link to	Above Evaluation?			
*Agency Area *R	egulatión Type	*Reg	ulation Citation				
*Date Determined (mm/dd/yyyy)	Branch *Person	Return to Compli Qualifie		RTC Actual Date (mm/dd/yyyy)			
·			er is required if C Actual Date.				
Comments: Seq. No.:							
OUTSTANDING VIOLATIONS	OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? (Y/N) If Yes, fill in information below						
Seq No. (T	gulation Citation ype + Citation) ex., FR 262.1)	*Agency	*Area	*Date Determined (mm/dd/yyyy)			
0007 40 CFR 262	.11	5		4/14/2005			
0012 40 CFR 26	5,173 Cb) 5,174	S		4/14/2005			
0009 40 CFR 263	1.34(Q)(D) 2.34(Q)(B)	5		4/14/2005			
OOID 25 PA CODE OOIO SWHA GOI	2624.20	5		4/14/2005			
	SECTION (Must be Co	ompleted if Handler is	a RCRA Non-N	lotifier)			
Handler Name							
Contact							
Street							
City		State	Zip C	Code			
County				·			
GENERATOR STATUS	CHANGE SECTION (Complete Only if Gen	erator Status C	hange is Required)			
i. Indicate the Current Notified		atus:					
ii. Indicate the Actual Generate Note: Facilities who are required to no Notification Form		LQG Non-Handler	SQG Closed	CESQG			
iii. Indicate the New	Transpo	orter 🗌	1	n-Transporter			
Transporter Status: (Fill out only if the facility requires a transporter status change)	If the transporter box is concleast one mode of transpo	hecked, you must check at ortation below:	in RCRAInfo	porter if the facility is currently listed as a transporter AND no longer ports hazardous waste.			
	☐ Air ☐ Wa						

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2500-FM-BWM0276	6/2005

Inspection Date	Hov.	18	2005
Time Start	t		-

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Time Fir	nish	

	ARDOUS WASTE INSPEC	
∐ GE	ENERATOR 🖂 S	Q GENERATOR
Company name Shr	9-Fin, Inc- 002498632 Employer 1.	D. Niverhau (FIN)
Site Address 111	Wissahickon Ave N	Chyhedd Twzip 19454
		(-w) h/00 1 21p 1 17 37
Name of Inspector	anjer 1995	2. 12.
Name & Title of Responsible (Official Ceorge Chitty	Thous (2) 5(1) 11/192
		Telephone (215) 541-4488
Mailing Address (if different fro		
Amount of Hazardous Waste	Generated per Month: No T	Pounds Kgs
7. Site Characterization.	•	
		. Drip Pad Other
	lization/WWTP Reclaim	Other
		☐ Containment Bldg. ☐ Drip Pad
2. Universal Waste: La	arge Quantity Handler	uantity Handler
Universal Waste Type	es	
3. Hazardous Waste Trans	porters:	
Transporter Name		License Number
Transporter Name		License Number
Transporter Name		License Number
4. Types of hazardous was	ste generated and destination facility	(location & type).
Waste Code	Waste Description	Destination Facility
	Clean up On-goin	g -

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name _	Spra-Fin, In	C ID Number		Date 11-10-2005
	1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Compliance

STATUS

1 2	ATU:		REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
		X	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
			Identification Number	262a.10	262.12	H002
	V		Authorized transporters only	262a.10	262.12(c)	H003
	У		Subsequent notification requirements met	262a.12(b)		H004
	χ		Proper manifest used	262a.10	262.21	H005
		X	Manifests filled out correctly and completely	262a.20		H006
		X	Manifests signed and routed properly	262a.23(a)	262.23	H007
		X	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	Х		SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	Х		SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
	X		Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
	X		Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
	X		Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
	X		Specified records retained for three years	262a.10	262.40(c)	H014
X			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	V		Exception reporting procedures followed	262a.42	262.42	H016
	X		Spill reporting procedures followed	262a.10	262.34(d)	H017
		Х	PPC plan developed and implemented	262a.10	262.34(a)	H018
	χ	1-	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
χ			Source reduction strategy prepared and available (LQG only)	262a.100		H020
	χ		Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
-						

HAZARDOUS WASTE INSPECTION REPORT **GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS**

Site Name Spra-Fin, Inc. ID Number Date 11-18-2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS				
3 4	REQUIREMENT	PA CIT. 25 PA Code	40 CFR	LINE NO.
	CONTAINERS (Subchapter I)			
X	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
	Containers of hazardous waste in good condition	265a.1	265.171	H026
	Containers and stored waste compatible	265a.1	265.172	H027
	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X	Containers managed to prevent leaks	265a.1	265.173(b)	H029
X	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X	Container storage areas inspected at least weekly	265a.1	265.174	H031
	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
	Proper containment and collection systems in place	265a.179		H033
(Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X	inspection accumulation date and visible for	262a.10	262.34(a)(2)	H035
X	Containers labeled "Hazardous Waste"	10	262.34(a)(3)	H036
X	Containers labeled accurately identify contents	SWMA 6018.403(b)		H037
× ×	X X X	REQUIREMENT CONTAINERS (Subchapter I) Containers managed in compliance with 40 CFR Part 265 X Subpart I and 25 PA Code Chapter 265a Subchapter I Containers of hazardous waste in good condition Containers and stored waste compatible Containers kept closed except during addition or removal of wastes Containers managed to prevent leaks Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment Container storage areas inspected at least weekly Special requirements for ignitable or reactive and incompatible waste complied with Proper containment and collection systems in place Air emission standards complied with (AA, BB, CC)	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I Containers of hazardous waste in good condition Containers and stored waste compatible Containers kept closed except during addition or removal of wastes Containers managed to prevent leaks Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment Container storage areas inspected at least weekly Special requirements for ignitable or reactive and incompatible waste complied with Proper containment and collection systems in place Air emission standards complied with (AA, BB, CC) Containers labeled "Hazardous Waste" Containers labeled accurately identify contents SWMA	REQUIREMENT 25 PA Code 40 CFR CONTAINERS (Subchapter I) Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I Containers of hazardous waste in good condition 265a.1 265.171 Containers and stored waste compatible 265a.1 265.172 Containers kept closed except during addition or removal of wastes Containers managed to prevent leaks 265a.1 265.173(a) Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment Container storage areas inspected at least weekly 265a.1 265.174 Special requirements for ignitable or reactive and incompatible waste complied with Proper containment and collection systems in place 265a.1 265.178 Air emission standards complied with (AA, BB, CC) 265a.1 265.178 Containers labeled "Hazardous Waste" 262a.10 262.34(a)(2) Containers labeled accurately identify contents SWMA

2540-FM-BWM0406 6/2005



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU WASTE MANAGEMENT

Inspection	ID	
Field Code		

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD 002498632 Site Name: Spra-Fin, Inc. Address: 177 Wissa hickon Ave. North Walst PA 19454 Municipality: Vpran Carland Turp. Responsible Official: Person Interviewed: Inspector: Charles Fees EFACTS ID#: PF S Inspection Date: 11/18/2005 Type:	Telephone #:
Waste Description: Pouder Coat Wast	Waste Code:
Treatment: Yes No Type:	
Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐	☐ Impoundments
Disposition: Destination Facility Shipped off-11-1	: Disposal receipts not avuilable
Location:	Expe: at time of ingrection
Amount Consented:	h /ma
Waste Description: Waste Jelus: Schab me	ken wood pullats
Waste Description: Waste delais: SCHAD me	Waste Code:
Treatment: Yes No Type:	
Type of Storage: ☐ Containers ☐ Tanks ☐ Piles ☐	☐ ,Impoundments
Disposition: Destination Facility Hot /4+	Shipped -
Location	Type:
Amour nerated:	b.n ~
Waste Description:	vvaste Coue:
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles	
Disposition: Destination Facility	
Location:	
Amount Generated:	b./mo.
Waste Description:	Waste Code:
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles	
Disposition: Destination Facility	
Location:	
Amount Generated:	

Site Name	Spra- Fin Inc-
ID Number Date	11-18-2005
Date	11-10-2003

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

	STA	TUS	3			CHAPTER	LINE
1	2	3	4		MENTS ACHED	CITATION	ITEM
		X		Designated facility: valid permit? Permit Number (PA)		287.6	1
				Biennial report submitted by March 1 of each odd numbered year.		287.52(a)	2
		X		Written source reduction strategy on file and in effect.		287.53	3
		X		Waste reduction strategy covers all waste streams.		287.53(b)	4
		X		Reduction strategy updated every five years or when waste or manufacturing process changes.		287.53(c)	5
M				Waste analysis performed: copy on file.		287.54	6
		囟		Annual analysis or certification of waste submitted to Department and designated facility.		287.54(b)(f)	7
		囟		Chemical analysis updated every five years or when waste or manufacturing process changes.		287.54(g)	8
	П	X		Generator record keeping requirements.	П	287.55	9
H	H	卤	H	Operation of disposal or processing facility without a permit.	一一	287.101(a)	10
		123	-	STORAGE REQUIREMENTS		201.101(4)	1.0
_							
X	닉	닏	Щ	Residual waste not mixed with hazardous waste.	_닡	299.111(1)	11
X	Щ	Щ		Waste stored as not to create a safety risk.	_닏	299.111(2)	12
X	H	닏	닐	Residual waste not mixed with special handling waste.	닏	299.111(3)	13
닏	닏	X	닐	Waste not blown or otherwise deposited outside storage area.	-님	299.111(4)	14
닏	H	X	닐	Storage area inspected; records available.		299.112(c)	15
H	H	닏		All waste stored less than one year. See "Comments" hu. 6		299.113(a)	16
닏	닏	X	닏	Equipment maintained in operable condition.	-닏	299.114(a)	17
닏	부	X	닏	Equipment cleaning frequencies maintained.		299.114(c)	18
Ш	Ш	X	Ш	Vectors controlled and minimized.		299.115	19
		M		Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.		299.116(a)(b)	20
		X	Ш	Waste stored to prevent groundwater degradation.		299.116(c)	21
닐	Ш	X		Sufficient number of properly constructed storage containers.		299.121	22
X		Ш	Ш	Storage containers labeled properly.	\sqcup	299.121(d)	23
Ш	Ц	Ш	닏	Storage container height and access requirements.		299.121(e)	24
	M	Ш	닏	Storage tank design standards.	_Ц	299.122	25
Ш	\boxtimes	Ш	Ш	Storage tanks labeled properly.		299.122(a)	26
	\boxtimes			No putrescible waste or liquid waste stored in piles.		299.112(d), 299.131(b)	27
	X			Waste storage pile area properly designed, constructed and maintained.		299.131	28
	\boxtimes			Storage pad or liner system properly designed and maintained.		299.132	29
	\boxtimes			Proper design and maintenance of leachate and runoff control systems.		299.133	30
	\boxtimes			Proper storage and containment of incinerator ash residue.		299.151	31
	X			Proper storage and containment of friable asbestos containing waste.		299.152	32
	\boxtimes			Proper storage and containment of coal ash.		299.153	33
	X			Proper storage and containment of PCB containing waste material.		299.154	34
	X			Proper storage of whole and processed tires.		299.155	35
니	Ш						
니			니				

Date of inspection 11-18-2005

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Identification Number PAD 002498632

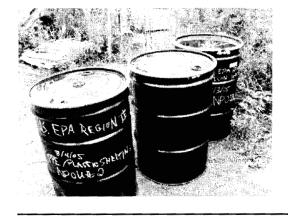
Company/Facility/Site NameSpra-Fin, Inc.	
On this date, Charlie Fees of the PA DEP conducted a hazardous and residual waste	e generator inspection.
The following observations were made:	
 Some of the waste, which was present during the inspection of 8-30-2004, had be that the 69 blue metal drums had been removed. These drums reportedly conta- coat sludge. 	een removed. I observed ined non-hazardous powder
2. Nicholas Brescia of the EPA informed me that many of the drums of waste, local been removed as well. (At time of inspection I could not verify this, as I did not the building)	
3. The EPA, who is overseeing this phase of the clean up, is in possession of recei that have been removed from the Spra-Fin property.	pts of disposal for the wastes
4. Inspection of the outside of the Spra-Fin plant revealed the following remaining removed:	wastes that need to be
a) Approximately six (6) 55- gallon drums with the markings "EPA"b) A large amount of residual waste debris in the form of scrap metal, wooden lying in a disorganized manner, mostly at the east end of the property.	pallets, and pieces of wood
5. The Spra-Fin Company failed to respond in writing or phone to the Notice-of-V Department on May 24, 2005. However, President George Chittenden cited "I Spra-Fin failed to remove the solid wastes at its property in North Wales, PA.	violation issued by the ack of funds" as the reason
This inspection report is notice of the findings of an inspection conducted by a representative o notification of any violations observed during the inspection. Additional notification of violations may be is herein, or other violations identified as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing con imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on the person was shown the report or that a copy was left with the person.	ssued concerning either violations noted tained herein shall be deemed to grant or
Person interviewed (signature)	Date
Inspector (signature)	Date
	Page (a of)

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

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Spra-Fin, Inc. should comply with the DEP and EPA regulations and correct the violations listed above.





This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (s	ignature)	mailed	Date	12-2 6-05
Inspector (signature)	(Carlie /) es		Date	1-18-05
	, , ,			Page 7 of 7



110113 322

ENFORCEMENT FORM

Please attach to Evaluation - Violation Form

	6%	13
	Y	•
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* -		

	*EPA ID N	lumber		Handler Name				
PAD	0024	98632	-		Spra - F	in		
*ENFORG	EMENT	Add 🔼 C	hange 🗌	Delete 🗌	•			
Seq No.	5/24/7005 S 20 Washe CF							
Enforc	ement Notes	· Hotic	e-of-	Violatio	Ph			
		۸	fultimedia Er	forcement Ac	tions (Check	all that apply)		
☐ AIR ☐ FIFRA ☐ TSCA PCB ☐ UIC ☐ WETLANDS								
	EPCRA	☐ SPCC	L	UST		WATER		
		*VIOLA	TIONS COVE	RED BY AB	OVE ENFOR	RCEMENT ACTIO	N	
*Адепсу	*Area	Seq No	*Regulat Citatio (Type + Cit (ex. FR 20	n ation) De	*Date etermined m/dd/yyyy)	Scheduled RTC Date (mm/dd/yyyy)		RTC Actual Date (mm/dd/yyyy) Ialifier is required if RTC Actual Date
.5	GUR	[XXX]	PR 20	D.II 4/	14/2005	6/3/2005		
5	668	0008	FR 26.	1.346 (4) 4	14/2005	6/3/2005		
	GGR		PR 265	.51(a) 4/	14/2005	6/3/2005		
5	66R	0.013	FR 265	:17/ 4/	14/2005	6/3/2005	С	8-30-05
2	GGR	P 6015	FR 265.	1736a) 4/1	4/2005	0/3/2005	c	2-30-45
2	GUR	0012	PR XS.	77(6) 4/1	4/2005	6/3/2005		
<u></u>	GER	0006	FE 265.	174 4	14/2005	6/3/7005		
2	GPT	0009	FR 262.	34(a)(b) 4	114/2005	6/3/2005		
5	GPT	0016	FR 263.	34(0)(3) 4	14/2005	6/3/2005		
5	GHR	0011	FR 262		14/2005	6/3/2005		
5	GGR	<u> </u>	FR 270	1(b) 4/	14/2005	6/3/2005		

EPA



Pennsylvania Department of Environmental Protection

2 East Main Street Norristown, PA 19401 May 24, 2005

Southeast Regional Office

Phone: 484-250-5960

Fax: 484-250-5961

NOTICE OF VIOLATION

CERTIFIED MAIL NO. 7001 2510 0005 8144 1784

Mr. Chittenden
Spra-Fin, Inc.
i/c/o Montgomery Powder Coating
218 East 6th Street
Red Hill, PA 18076

Re: Non-Compliance, Hazardous Waste Activity

Spray Fin, Inc.

Upper Gwynedd Township Montgomery County

Dear Mr. Chittenden:

As a result of an inspection conducted on April 14, 2005, at the referenced facility, the Department of Environmental Protection (Department) has determined that Spray Fin, Inc., is in violation of the Solid Waste Management Act (SWMA), Act of July 7, 1980, P.L. 380, No. 97, 35 P.S. Section 6018.101 et seq., the Hazardous Waste Management Rules and Regulations found at 40 C.F.R. Parts 260 to 270 incorporated by reference at 25 Pa. Code Chapters 260a to 270a and 25 Pa. Code Chapters 287 to 299 as follows:

- A. Spra-Fin failed to determine if the solid waste that it generates is a hazardous waste. This is contrary to 40 C.F.R. Section 262.11.
- B. Spra-Fin accumulated hazardous waste on-site for more than 90 days. This is contrary to 40 C.F.R. Section 262.34(a).
- C. Spra-Fin failed to have a preparedness, prevention, and contingency (PPC) plan for its facility. This is contrary to 40 C.F.R. Sections 265.51(a) and 262.34(a)(4).
- D. Spra-Fin failed to transfer hazardous waste from leaking or hazardous wastes containers not in good condition to a container that is in good condition. This is contrary to 40 C.F.R. Section 265.171.

Mr. Chittenden

- 2 -

May 24, 2005

- E. Spra-Fin failed to keep closed its containers holding hazardous waste. This is contrary to 40 C.F.R. Section 265.173(a).
- F. Spra-Fin failed to manage its containers holding hazardous waste in a manner to prevent leaks. This is contrary to 40 C.F.R. Section 265.173(b).
- G. Spra-Fin failed to conduct weekly inspections of its hazardous waste storage areas. This is contrary to 40 C.F.R. Section 265.174.
- H. Spra-Fin failed to mark its containers of hazardous waste with an accumulation "start" date. This is contrary to 40 C.F.R. Section 262.34(a)(2).
- I. Spra-Fin failed to mark its containers with a "hazardous waste" label. This is contrary to 40 C.F.R. Section 262.34(a)(3).
- J. Spra-Fin failed to prepare manifests for the transportation of hazardous waste for off-site treatment, storage, or disposal. This is contrary to 40 C.F.R. Section 262.20(a).
- K. By failing to accumulate hazardous waste in accordance with 40 C.F.R. Section 262.34, Spra-Fin has stored hazardous waste without first obtaining a permit from the Department. This is contrary to 40 C.F.R. Sections 270.1(b) and (c), and Section 401(a) of the SWMA.
- L. Spra-Fin failed to submit a residual waste biennial report to the Department by March 1, 2005, for its residual wastes generated in the year 2004. This is contrary to 25 Pa. Code Section 287.52(a).
- M. Spra-Fin failed to perform a waste analysis on its waste powder coat sludge. This is contrary to 25 Pa. Code Section 287.54.
- N. Spra-Fin failed to inspect its storage areas for residual wastes. This is contrary to 25 Pa. Code Section 299.112(c).
- O. Spra-Fin failed to ship its residual wastes off-site for disposal within one (1) year of its generation. This is contrary to 25 Pa. Code Section 299.113(a).
- P. Spra-Fin failed to affix a "residual waste" label to its containers of residual waste. This is contrary to Pa. Code Section 299.121(d).

The activities and conditions described in paragraphs A thru P above constitute unlawful conduct pursuant to Sections 302(a), 403(a), (b)(1)(2)(3)(5)(9)(10) and (11), 501(a), 610(2), (4), (6), and (9) of the SWMA; constitute a public nuisance pursuant to Section 601 of the SWMA; and may subject the offender to civil penalty liability pursuant to Section 605 of the SWMA.

You are notified of both the existence of the violation(s) as well as the need to provide prompt correction. Failure to correct the violation(s) may result in legal proceedings under the SWMA. Under the Act, each day of the violation is considered a distinct and separate offense and will be handled accordingly.

It is suggested that by June 3, 2005, Spra-Fin should submit a report to the Department addressing the circumstances under which these violations occurred, and the actions it has undertaken to correct these violations and prevent their recurrence.

This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions about this letter, please contact me at 484-250-5735.

Sincerely,

Charlie Fees

Waste Management Specialist Waste Management Program

Re 30 (GJS05)138

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-		

DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

FPL

E	VALUATION - VIOLATION FOR	M			
*EPA ID Number PAD 0 02498632 EIN -					
Handler Name Spha. Fin Inc.					
*Street 177 WISSA					
*City North Walt	S *State PA *Zip C	ode 19454 ,			
Actual Generator Status Check only if different from Notified Status	LQG SQG CESQG Closed No	n-Handler			
Generator Status Change Required?	form).	tatus Change Section (on reverse side of this			
RCRA Non-Notifier? YES NO S If YES, complete the Handler Section (on reverse side of this form).					
Other Facility Information Changes	YES NO If YES, complete the Handler Sec	ction (on reverse side of this form).			
*EVALUATION Add (Change Delete D				
*Type *Date (mm/do	d/yyyy) *Agency *Responsible Person COS S Comments:	Branch WM			
Check only if making a SNC determination. do not fill in the Evaluation Type field.					
VIOLATION Add ⊠ Change	Delete 🗌	Link to Above Evaluation? 🔽			
*Agency Area *Regul	lation Type *Regulatio	on Citation			
S GGZ FR	2 40 CFR 2(5.171	1/2			
*Date Determined Bra (mm/dd/yyyy) Bra	nnch *Person Return to Compliance Qualifier	(mm/dd/yyyy)			
4/14/2005	A RTC Qualifier is re entering a RTC Actu				
Comments: damayed	contained over packed	Seq. No.: 0013			
VIOLATION Add M Change	Delete	Link to Above Evaluation?			
*Agency Area *Regul	lation Type *Regulatio	on Citation			
S GGF FD	40 CFR 265.173	(a)			
*Date Determined (mm/dd/yyyy) Bra	anch *Person Return to Compliance Qualifier	(RTC) RTC Actual Date (mm/dd/yyyy)			
4/14/7005 W	A RTC Qualifier is re entering a RTC Actu				
Comments: Hazandust	waste containens closed	Seq. No.: (CO15) 20			
VIOLATION Add 🛭 Change	e Delete	Link to Above Evaluation?			
*Agency Area *Regu	lation Type *Regulati	on Citation			
S GHZ FR	40 CFR 2620(a				
*Date Determined Bra (mm/dd/yyyy)	anch *Person Return to Compliance Qualifier	(RTC) RTC Actual Date (mm/dd/yyyy)			
9/20/2	A RTC Qualifier is re entering a RTC Acti	equired if			
Comments: Manifest h.	+ used to document thangon	seq. No. 0017			
	natardou waste Manifest no	t used to document transported			

EPA ID Number PAD	002498 (32	Handler Name	Spra-Fin, Inc.
VIOLATION Add Chang	ge 🗌 Delete 🔲		Link to Above Evaluation?
'Agency Area 'Reg	ulation Type	*R	legulation Citation
*Date Determined (mm/dd/yyyy)	ranch *Person	Return to Comp Quali	
Comments:			RTC Actual Date. Seq. No.:
VIOLATION Add Chan	ge Delete		Link to Above Evaluation?
	gulatión Type	*R	Regulation Citation
*Date Determined (mm/dd/yyyy)	Branch *Person	Return to Com Qual	lifier (mm/dd/yyyy)
			alifier is required if RTC Actual Date.
Comments:			Seq. No.:
OUTSTANDING VIOLATIONS C	OVERED BY ABOVE	EVALUATION? (Y/	N If Yes, fill in information below
Seq No. (Ty	ulation Citation pe + Citation) c., FR 262.1)	*Agency	*Area *Date Determined (mm/dd/yyyy)
000°7 40 CFR 262	11 34 (4)	Z.	G-G-R 4/14/2005
CC19 40 CER 265.	173 (b) 174		GUF 4/14/7005
CCC9 40 CFR 262.	34 (4) (2) 34 (4) (3)	5	GPT 4/14/7005
CCIC SWMA GOI	26 (403 (h)	5	4/14/7005
HANDLER S	ECTION (Must be Co	ompleted if Handler	r is a RCRA Non-Notifier)
Handler Name			
Contact			
Street		·•	
City		State	Zip Code
County			
			enerator Status Change is Required)
i. Indicate the Current Notified I			
ii. Indicate the Actual Generator Note: Facilities who are required to note Notification Form		LQG Non-Handler	<u>_</u>
iii. Indicate the New Transporter Status:	Transp	orter 🗌	Non-Transporter
(Fill out only if the facility requires a transporter status change)	If the transporter box is of least one mode of transport		Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.
	Air Wa	ater	

2500-FM-BWMQ276 6/2005

COMMONWEALTH OF PENNSYLVANIA PLANT DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

nspection Date August	30	2005
Time Start		

1445700	HAZARDOUS WASTE IN

	Time Finish _
AZARDOUS WASTE	INSPECTION REPORT
GENERATOR	S Q GENERATOR

			
Cor	mpany name	-Fin Inc.	
EP/	A I.D. Number PA	1D 002498632 Employer	I.D. Number (EIN)
Site		lissahickon Ave. No	
Col	unty Montgom	Phy Municipality Vhade (Twyned Tupzip 19454
Na	me of Inspector	Michael France !	
Nai	me & Title of Responsible	e Official (reorge (h)	Henden President
Per	son Interviewed	011	Telephone (215) 541-4488
Ма	iling Address (if different	from above)	
Am	ount of Hazardous Wast	e Generated per Month: hvt	Pounds Kgs
1.	Site Characterization:	dotern	ingo
	STORAGE: 💢 Conta	ainer 🔲 Tanks 🔲 Containment Bl	dg. Drip Pad Other
	PBR: Neutr	ralization/WWTP	Other
	GENERATOR TREATM	MENT ☐ Containers ☐ Tanks	☐ Containment Bldg. ☐ Drip Pad
2.	Universal Waste:	Large Quantity Handler	Quantity Handler
	Universal Waste Ty	pes	
3.	Hazardous Waste Trai	nsporters:	
	Transporter Name		License Number
	Transporter Name		License Number
	Transporter Name		License Number
4.	Types of hazardous w	aste generated and destination facil	ity (location & type).
	Waste Code	Waste Description	Destination Facility
	~ ^	lean up on-going	4 -
		The state of the s	
		<u>L </u>	

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS

Site Name	Spra-Fin In	ID Number		32 Date <u>8-30-05</u>
	1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Compliance

STATUS PA CIT. FED. CIT. LINE 1 2 3 4 REQUIREMENT 25 PA Code 40 CFR NO. Hazardous waste determination performed on all waste streams 262a.10 262.11 H001 Identification Number 262a.10 262.12 H002 Authorized transporters only 262a.10 262.12(c) H003 Subsequent notification requirements met H004 262a.12(b) Proper manifest used 262a.10 262.21 H005 Manifests filled out correctly and completely 262a.20 H006 262.23 Manifests signed and routed properly 262a.23(a) H007 Generator waste accumulated on site for 90 days or less 262a.10 262.34(a) **H008** SQG waste accumulated on site for 180 days max unless 200 mile 262a.10 262.34(e)(f) H009 distance rule applies - 270 days SQG waste accumulated on-site never exceeds 6000 kg 262a.10 262.34(e)(f) H010 H011 Satellite accumulation requirements complied with 262a.10 262.34(c) H012 Personnel training program per 265.16 complied with 262a.10 262.34(a)(4) 262.34(d) 262a.10 262.40(a)(b) H013 Manifest exception and biennial reports retained for 3 years 262a.10 262.40(c) H014 Specified records retained for three years 262.41 H015 262a.41 Biennial reports submitted to the Department (LQG only) H016 Exception reporting procedures followed 262a.42 262.42 Spill reporting procedures followed 262a.10 262.34(d) H017 H018 PPC plan developed and implemented 262a.10 262.34(a) H019 262a.10 262.50 Special requirements followed for international shipments 262.60 H020 262a.100 Source reduction strategy prepared and available (LQG only) Excluded waste complies with exclusionary requirements 261a.4 261.4 H021

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name	Spra-Fin. In	C	ID Number		Date	8-30-05
	1 - No Violation Observed	2 - Not App	olicable	3 - Not Determined	4 - Non Co	ompliance

STATUS

1	1 2 3 4		4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
			X	CONTAINERS (Subchapter I)			
			X	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
V				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
χ				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
			Χ	Containers managed to prevent leaks	265a.1	265.173(b)	H029
)	χ	,	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
	ľ		χ	Container storage areas inspected at least weekly	265a.1	265.174	H031
	,	X		Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
	\	X		Proper containment and collection systems in place	265a.179		H033
	П			Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
			X	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
			χ	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
			Х	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

2540-FM-BWM0406 6/2005



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU WASTE MANAGEMENT

Inspection ID	
Field Code	

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Site I.D.: PAD CC2498(32 Site Name: Spra-Fin The Operator Name: Address: Operator Name: Address: Municipality: Vhren Cahell Ture County: Mont goment Title: Preson Interviewed: Title: Title: "Title: "Title: "Title: Sw(eFACTS ID #: PF SF Inspection Date: 8/36/7.005 Type: No. of Violations: 5 Time:
Waste Description: Powder Coat Waste Waste Code:
Treatment: Yes No Type:
Type of Storage: ☑ Containers ☐ Tạnks ☐ Piles ☐ Impoundments
Disposition: Destination Facility - Not Yet Shipped -
Location: Type:
Amount Generated: lb./mo.
Waste Description: Waste Code: Treatment:
Location: Type:
Amount Generated: lb./mo.
Waste Description: Waste Code: Treatment:
Disposition: Destination Facility
Location: Type:
Amount Generated: lb./mo.
Waste Description: Waste Code:
Treatment: Yes No Type:
Type of Storage: Containers Tanks Piles Impoundments
Disposition: Destination Facility
Location: Type:
Amount Generated: lb./mo.

Site Name	Spra-Fin	
ID Number	V	_
Date	8-30-05	_

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

	STA	TUS		CHAPTER	LINE		
1	2	3	4	GENERAL REQUIREMENTS ATTAC		CITATION	ITEM
		\boxtimes		Designated facility: valid permit? Permit Number (PA)		287.6	1
				Biennial report submitted by March 1 of each odd numbered year.		287.52(a)	2
		\mathbf{X}		Written source reduction strategy on file and in effect.		287.53	3
		X		Waste reduction strategy covers all waste streams.		287.53(b)	4
		Ø		Reduction strategy updated every five years or when waste or manufacturing process changes.		287.53(c)	5
				Waste analysis performed: copy on file.		287.54	6
		X		Annual analysis or certification of waste submitted to Department and designated facility.		287.54(b)(f)	7
		Ø		Chemical analysis updated every five years or when waste or manufacturing process changes.		287.54(g)	8
П		X		Generator record keeping requirements.		287.55	9
	Ħ	Ø	I	Operation of disposal or processing facility without a permit.	П	287.101(a)	10
Γ				STORAGE REQUIREMENTS			
\vdash		Ø	\Box	Residual waste not mixed with hazardous waste.	П	299.111(1)	11
H	ᅡ片	図	H	Waste stored as not to create a safety risk.	H	299.111(2)	12
H	片	岗	╁╄┥	Residual waste not mixed with special handling waste.	H	299.111(3)	13
H	╁		╫	Waste not blown or otherwise deposited outside storage area.	H	299.111(4)	14
片	╁	H	懂	Storage area inspected; records available.	Ħ	299.112(c)	15
H	╁┼	1		All waste stored less than one year.	-	299.113(a)	16
H	╁┼	岗	 	Equipment maintained in operable condition.	Ħ	299.114(a)	17
H	╁Ħ	H	H	Equipment cleaning frequencies maintained.	H	299.114(c)	18
H	Ħ	K	H	Vectors controlled and minimized.	П	299.115	19
		×		Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.		299.116(a)(b)	20
		Ø		Waste stored to prevent groundwater degradation.	П	299.116(c)	21
	怈	X	╁ॉ	Sufficient number of properly constructed storage containers.	Ħ	299.121	22
	╁ॉन			Storage containers labeled properly. See "Pomment" page 7		299.121(d)	23
	╅	X	╅	Storage container height and access requirements.	T	299.121(e)	24
			⇈	Storage tank design standards.		299.122	25
			1	Storage tanks labeled properly.		299.122(a)	26
	×	1		No putrescible waste or liquid waste stored in piles.		299.112(d), 299.131(b)	27
	×			Waste storage pile area properly designed, constructed and maintained.		299.131	28
H	X		怈	Storage pad or liner system properly designed and maintained.	一百	299.132	29
Ħ	X		T	Proper design and maintenance of leachate and runoff control systems.	П	299.133	30
IT	X		ΙĦ	Proper storage and containment of incinerator ash residue.	一一	299.151	31
H	X		T	Proper storage and containment of friable asbestos containing waste.	T	299.152	32
	X	_	H	Proper storage and containment of coal ash.	Ħ	299.153	33
				Proper storage and containment of PCB containing waste material.	一一	299.154	34
	X			Proper storage of whole and processed tires.	Ħ	299.155	35
			Ħ		Ħ		
			ΙĦ		H		
					H		1
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		HH	TH		퓜		<u> </u>
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			tΗ		H		-
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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

Date of inspection 8-30-2005	Identification N	umber PAD 00	2498632					
Company/Facility/Site NameSpra	Fin, Inc.							
Introduction								
On this date, Charlie Fees of the PA DEP, as we hazardous and residual waste generator inspection			EPA, conducted a					
Background								
Based on notification by the EPA of the presence inspection of Spra-Fin on April 14, 2005.	e of abandoned wastes, the Depa	artment conducte	ed a hazardous waste					
and residual wastes. (More than 300 containers condition, lack of inspections, and exceeding the	At that time (10), violations of the hazardous waste regulations were identified. There were large quantities of hazardous and residual wastes. (More than 300 containers total) The violations included lack of proper labeling, poor container condition, lack of inspections, and exceeding the 90-day time limit for the storage of hazardous wastes. During the inspection, George Chittenden said that the paint lines had operated at this location until May of 2004.							
The EPA directed George Chittenden to immediall the abandoned wastes. The waste included the After characterization, the wastes were to be training.	ose that appeared to be ignitable	le (D001) as well	as corrosive (D002).					
The Department issued a Notice-of-Violation ("	NOV") to Mr. Chittenden of the	e Spra-Fin Compa	any on May 24, 2005.					
Mr. Chittenden did not respond in writing to the	NOV.							
The purpose of today's inspection was to determ company had shipped its wastes to a permitted of	•	ted the violations	and to determine if the					
Nicolas Brescia, Don McLaughin and myself 1 ^s Boro, Montgomery County. MPC is located appresident of both companies.	<u> </u>	, , ,						
We met George Chittenden at MPC at 1:30 pm.	Then we drove to the Spra-Fin	Company, arrivi	ng at 2pm.					
This inspection report is notice of the findings notification of any violations observed during the inspecti herein, or other violations identified as a result of review of This report does not constitute an order or other imply immunity from legal action for any violation noted here Signature by the person interviewed does not not person was shown the report or that a copy was left with the	on. Additional notification of violations aboratory analyses or Department recor- appealable action of the Department. Notinin. cessarily imply concurrence with the fire	s may be issued con rds. Nothing contained her	ncerning either violations noted rein shall be deemed to grant o					
Person interviewed (signature)	nailed	Date	10-12-05					
Inspector (signature)	18	Date	6.30-02					
			Page 6 of 9					

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection	8-30-2005		Identification Number	PAD 002498632	
Company/Facility/Site Na	ime	Spra-Fin, Inc.			

Inspection

At the Spra-Fin Company, I observed that the hazardous wastes in the form of varnishes, paints, and thinners, had been removed from the outside trailers, and consolidated inside in the main building. The EPA personnel said that most of this waste had already been shipped offsite for disposal.

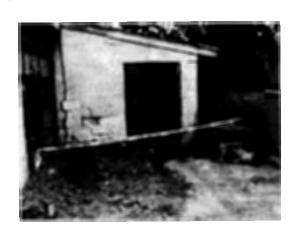
However there is much waste remaining at this site, including:

- 1. Approximately thirty (drums) of hazardous wastes listed as corrosive and/or ignitable. (The markings of one blue, plastic 55-gallon drum read: "Chryscoat" and a label indicating the presence of hydrofluoric & phosphoric acids, as well as diethylene glucol butyl ether)
- 2. Approximately 69 blue metal drums, which were unmarked. These drums, 1st identified during the inspection of 4-14-2005, are believed to contain non-hazardous powder coat sludge.

The EPA reported that George Chittenden of Spra-Fin contracted for the removal of some of the wastes. However the job was not completed. Mr. Chittenden cited lack of funds for the cessation of waste removal.

During today's inspection, Nick Brescia obtained from George Chittenden permission for the EPA to access the Spra-Fin property for the characterization and removal of the remaining hazardous wastes.





This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)	V 1 1	a mailed	Date	10-12-05
1	Partei //) le	Date	8-30-05
				Page

Inspector (signature)

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection	8-30-2005		Identification Number	PAD 0024	198632
Company/Facility/Site N	Name	Spra-Fin, Inc.			
Conclusion and Recom	mendations				
The Department recomm located at 177 Wissahick				esidual was	tes at its property
Spra-Fin, Inc. remains in	violation of the fo	llowing hazardous a	nd residual waste regula	tions:	
40 CFR 262.12 40 CFR 262.34(a) 40 CFR 262.34(a)(4 40 CFR 265.173(b) 40 CFR 265.174 40 CFR 262.34(a) 40 CFR 262.34(a)(3) SWMA 6018.403(b)(2) 25 PA Code 299.113(a) 25 PA Code 299.121(d)	"Preparedness, pre "Containers mana "Container storag "Containers mark "Containers label "Containers label "All residual was	dous) waste accumul	ekly" tion date" '." tify contents" year"		plemented"
In addition, George Chit the Spra-Fin Company, a		-		hazardous	wastes disposed of by
	or storage facility.	d for a minimum of	ation of hazardous wast	te to an offs	ite treatment, disposal
I reviewed the results of	this inspection with	h George Chittender	n prior to my departure.		
notification of any violations herein, or other violations ider This report does no imply immunity from legal acti	observed during the in hiffied as a result of revi t constitute an order or on for any violation note erson interviewed does or that a copy was left v	spection. Additional not ew of laboratory analyses other appealable action of the herein. not necessarily imply cor		e issued conce ontained hereir	erning either violations noted a shall be deemed to grant or

Date

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection	8-30-2005		dentification Number _	PAD 002498632	
Company/Facility/9	Site Name	Spra-Ein Inc			







This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) \triangle_{A}	mailed	Date	10-12-05
Inspector (signature)	l Jes	Date	8-30-05
		-	Page of

25-Q-FM-LRWM0180 6/2004

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

ELI	i	۲
Erd		

,	VALUATION	- VIOLATION FORM	LIA
*EPA ID Number PAD 00	2498632	EIN	-
Handler Name Spra-	Fin, Inc	and the second of the second o	
	, , , , , , , , , , , , , , , , , , ,	√4	
*City Nonth Wales	*State	PA *Zip Co	de 19454
Actual Generator Status Check only if different from Notified Status	LQG 🗆 SQG 🗀	CESQG Closed Non-	Handler HW Transporter
Generator Status Change Required?	YES NO NO Storm).	If YES, complete the Generator State	tus Change Section (on reverse side of this
RCRA Non-Notifier?	YES NO	If YES, complete the Handler Section	on (on reverse side of this form).
Other Facility Information Changes	YES NO	If YES, complete the Handler Section	on (on reverse side of this form).
*EVALUATION Add 🔀	Change Dele	ete 🗌	
*Type *Date (mm/c		cy *Responsible Person	Branch
CEI 4/14/2	200	CJF	VEGSTE MAN
SNY SNN	Comm	nents:	
Check only if making a SNC determinatio do not fill in the Evaluation Type field.		q No.:	
VIOLATION Add 💢 Chang	e 🗌 Delete 🔲		Link to Above Evaluation?
*Agency Area *Regu	lation Type	*Regulation	Citation
() () () () () () () () () ()	12 400	CFE 212.11	1
*Date Determined Br (mm/dd/yyyy)	anch *Person	Return to Compliance (F Qualifier	RTC) RTC Actual Date (mm/dd/yyyy)
4/14/7005 14	ass CJF	A RTC Qualifier is requ entering a RTC Actual	
Comments: No hazan	dow waste	determination	Seq. No.: 000'
VIOLATION Add 🛛 Chang	e 🗌 Delete 🗌		Link to Above Evaluation?
*Agency Area *Reg	ulation Type	*Regulation	Citation
5 GGR F	R	40 CFR 212.34	(a)
! (mm/aa/vvvv)	anch *Person	Return to Compliance (I Qualifier	RTC) RTC Actual Date (mm/dd/yyyy)
11 111 17 20 1	Cost	A RTC Qualifier is requestering a RTC Actual	
Comments: Washe No	t removed	within 90 days	Seq. No.: 6006 Y
VIOLATION Add Chang	e Delete		Link to Above Evaluation?
*Agency Area *Reg	ulation Type	*Regulation	n Citation
S GUR FR	2	40 CFR 263, 34	(a)
*Date Determined B (mm/dd/yyyy)	ranch *Person	Return to Compliance ((mm/dd/yyyy)
	WM CZF	A RTC Qualifier is req entening a RTC Actua	al Date
Comments: PPO Plan	not doubl	oped or implem	ented Seq. No.: 00(4)

EPA ID Number	PA	D 00	2498632	Hand	dler Name	5	pra-	Fin	Inc	
VIOLATION A	dd 💢	Chang	e Delete			w			ve Evaluat	ion? 🔽
*Agency	Area	*Reg	ulation Type	Tablifor or sell observation is seller	*R	egulati	ion Citati	on		
S	JUR.	F	P 40	CFR	265.1	71			a despitação que acomposito de la composição de la compos	
*Date Detern (mm/dd/yy		Bi	ranch *Person	R	eturn to Com _i Quali	fier		,	RTC Actual (mm/dd/y)	
4/14/2	200	to	faste CJF		A RTC Qual entering a l	RTC Act	tual Date.			
Comments:	Conta	ilhérl	of hazardovs	waste	not in	2000	Cond	HIGH S	eq. No.: 🕥 (013
VIOLATION A	dd 🗓	Chang	je 🗌 Delete 🗌				Link	to Abo	ve Evaluat	ion? 🛱
*Agency	Area	*Reg	ulatión Type		*R	egulat	tion Citati	on		
S	56-12	F	2 40	CFR	265.1	13 (á	i)			
*Date Deterr (mm/dd/yy		В	ranch *Person	R	eturn to Com Qual		e (RTC)		RTC Actua (mm/dd/y	
4/14/2	005	Je Je	CJF		A RTC Qua entering a					
Comments:	Con	tainer	s of Waste 1	104 1	Lept 0	01.60	<u> </u>	- -	eq. No.:	215 2
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? (Y/N) If Yes, fill in information below										
Seq No.		(Typ	llation Citation ne + Citation) n., FR 262.1)		*Agency		'Area		*Date Deter (mm/dd/y	
			.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,							
						<u> </u>				
	HAN	DLER S	ECTION (Must be Co	omplete	d if Handler	is a F	RCRA NO	n-Not	ifier)	
Handler Name	•									
Contact										
Street										
City				State			2	ip Cod	е	
County										
			CHANGE SECTION (te Only if G	enerat	tor Statu	s Cha	nge is Requ	ıired)
			RCRAInfo Generator St	atus:					05000	
ii. Indicate the Note: Facilities wh Notification Form.			fy MUST STILL submit a		LQG Non-Handler	_	Clos	QG [CESQG	
iii. Indicate the			Transp	orter []				ransporter [
(Fill out only if the transporter s	e facility re		If the transporter box is a least one mode of transport			at C	in RCRA	Info as a	er if the facility in Intransporter Af In hazardous wa	
		- /		ater her	☐ Highway					

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		I VIOLATIONS tion – Violation Form)	
EPA ID Number		Handler Nam	
PAD 002498632	Spra-F	in Inc.	
VIOLATION Add ☑ Change	☐ Delete ☐		Link to Above Evaluation?
Agency Area Regula	tion Type	Regulation C	itation
S GOR FR	40 CF	P 265.173(1)	
Date Determined Bran	och Person	Return to Compliance (RT Qualifier	C) RTC Actual Date (mm/dd/yyyy)
4/14/2005	te CJF	A RTC Qualifier is require entering a RTC Actual De	
Comments: Lea King	Container	s of Waste	Seq. No: (D)
VIOLATION Add ☑ Change	☐ Delete ☐		Link to Above Evaluation?
Agency Area Regulat	tion Type	Regulation Ci	itation
S GOR FR	40 0	FR 265.174	
Date Determined Bran (mm/dd/yyyy)	ch Person	Return to Compliance (RT) Qualifier	C) RTC Actual Date (mm/dd/yyyy)
4/10/2005 W	M CJF	A RTC Qualifier is require entering a RTC Actual Da	ed if
	ctions being		Seq. No: 0000
VIOLATION Add ☑ Change	☐ Delete ☐		Link to Above Evaluation?
Agency Area Regulat	ion Type	Regulation Ci	tation
S FR	40 0	FR 262 34 (a)	(2)
Date Determined Brand (mm/dd/yyyy)	ch Person	Return to Compliance (RTC Qualifier	C) RTC Actual Date (mm/dd/yyyy)
4/14/2005 WI	M CJF	A RTC Qualifier is require entering a RTC Actual Da	
Comments: No accum	lation 'start	' dutes	Seq. No.
VIOLATION Add Change	☐ Delete ☐		Link to Above Evaluation?
Agency Area Regulati	on Type	Regulation Cit	ation
5 GPT FI	12 40 C	FR 26). 34 (a) ((3)
Date Determined Branc (mm/dd/yyyy)	h Person	Return to Compliance (RTC Qualifier	(mm/dd/yyyy)
4/14/2005 WA	1 CIF	A RTC Qualifier is required entering a RTC Actual Dat	d if le.
Comments: No "hazan	dous waste"	labels	Seq. No: 0016



		nal VIOLATIONS Juation – Violation Form	
EPA ID Number		Handler Nam	18
PAD 002498432	Spra-	Fin Inc.	
VIOLATION Add ☑ Change	☐ Delete ☐		Link to Above Evaluation?
Agency Area Regula	tion Type	Regulation C	Citation
S GGR SS	50	VMA 6018.4036	b)
Date Determined Bran (mm/dd/yyyy)	ch Person	Return to Compliance (R1	TC) RTC Actual Date (mm/dd/yyyy)
4/14/2005	THE COTE	A RTC Qualifier is requi entering a RTC Actual D	
Comments: Container	s not labo	led to identify co	ntents Seq. No. 0010
VIOLATION Add 🗹 Change	☐ Delete ☐		Link to Above Evaluation?
Agency Area Regulat	ion Type	Regulation C	itation
S GMR SR	25	PA Code 2620	i.) 0
Date Determined Brand (mm/dd/yyyy)	ch Person	Return to Compliance (RT Qualifier	C) RTC Actual Date (mm/dd/yyyy)
4/14/7005 WI	y WF	A RTC Qualifier is require entering a RTC Actual D	
Comments: Hunifeits	ut availab	hi for neview	Seq. No: OO (
VIOLATION Add ☐ Change	Delete		Link to Above Evaluation?
Agency Area Regulat	on Type	Regulation C	itation
Date Determined (mm/dd/yyyy)	h Person	Return to Compliance (RT Qualifier	C) RTC Actual Date (mm/dd/yyyy)
		A RTC Qualifier is require entering a RTC Actual Da	edif
Comments:			Seq. No:
VIOLATION Add Change	☐ Delete ☐		Link to Above Evaluation?
Agency Area Regulati	on Type	Regulation Ci	tation
Date Determined Branc (mm/dd/yyyy)	h Person	Return to Compliance (RTC Qualifier	(mm/dd/yyyy)
To 1,0000		A RTC Qualifier is require entering a RTC Actual Qa	te.
Comments:			Seq. No:



nspection Date	4-14-05
Time Start	130
Time Finish	430

		AZARDOUS WASTE INSPECTION GENERATOR 🔀 S Q G	N REPORT SENERATOR
Site Address		Missahiekon Aug No my Municipality 4. Cuynel	
Nama of Inc	nantar /	Was Las Fass	
Name & Title	of Responsib	e Official Ceorge Chittendin	President
Person Inter	viewed	li d	7 Telephone ()
Mailing Addr	ess (if different	from above)	
Amount of H	azardous Was	te Generated per Month: h + P	oundsKgs
	aracterization:		
STORA	GE: 💢 Con	ainer 🗌 Tanks 🔲 Containment Bldg. 🔲 Di	rip Pad Other
PBR:	☐ Neu	tralization/WWTP	Other
GENER	ATOR TREATI	MENT ☐ Containers ☐ Tanks ☐	Containment Bldg.
2. Univers	al Waste: 🔲	Large Quantity Handler	Handler
Univ	ersal Waste T	ypes	
3. Hazardo	ous Waste Tra	nsporters:	
Trar	nsporter Name		License Number
Trar	nsporter Name		License Number
Trar	nsporter Name		License Number
4. Types o	of hazardous v	vaste generated and destination facility (locat	ion & type).
Wa	iste Code	Waste Description	Destination Facility
	-	Clean-up Commenting	
	_ \	waste not yet shipped	aff site -

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name	Spry-Fin	ID Number ?	AD OUZ 49863	Date 4-14-05
	1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Compliance

STATUS

ST	ATUS	•			PA CIT.	FED. CIT.	LINE
1_	2	3	4	REQUIREMENT	25 PA Code	40 CFR	NO.
				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
		X		Authorized transporters only	262a.10	262.12(c)	H003
		X		Subsequent notification requirements met	262a.12(b)		H004
		X		Proper manifest used	262a.10	262.21	H005
		X		Manifests filled out correctly and completely	262a.20		H006
				Manifests signed and routed properly	262a.23(a)	262.23	H007
				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
		×		SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
		X		SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
		X		Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
		区		Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
		X		Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
		X		Specified records retained for three years	262a.10	262.40(c)	H014
	X			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
		X		Exception reporting procedures followed	262a.42	262.42	H016
		X		Spill reporting procedures followed	262a.10	262.34(d)	H017
				PPC plan developed and implemented	262a.10	262.34(a)	H018
		Ø		Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	図			Source reduction strategy prepared and available (LQG only)	262a.100		H020
		V		Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
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HAZARDOUS WASTE INSPECTION REPORT GENERATORS - SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site	Nam	e	1-4	-Fin Inc. ID Number_	Date4	-14-05	
		1	- No \	Violation Observed 2 - Not Applicable 3 - Not Determined	4 - Non Com	pliance	
STA	TUS						
1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
			#	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
				Containers of hazardous waste in good condition	265a.1	265.171	H026
		X		Containers and stored waste compatible	265a.1	265.172	H027
				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
				Containers managed to prevent leaks	265a.1	265.173(b)	H029
		Ø		Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
				Container storage areas inspected at least weekly	265a.1	265.174	H031
		X		Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
		X		Proper containment and collection systems in place	265a.179		H033
				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
			10	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
				Containers labeled accurately identify contents	SWMA 6018.403(b)		H037

2540-FM-LRWM0406 Rev. 10/2001



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION 3UREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID	
Field Code	

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

INSPECTION REPORT - RESI	DUAL WASTE GENERATOR
Site I.D.: <u>PAD 002498632</u>	Telephone #:
Site Name: Stra-Fin Inc. Address: Michalicken Drive	Operator Name:
Address: 177 Wistable Kon Drive	Address:
North Walt. IA	
Municipality: 1/pres Cuy hed Trut	County:
Responsible Official. Charge Chittenden	Title: The Holen +
Inspector: Chapita Feet	Title:
eFACTS ID #: PF	SF
Inspection Date: 4 /14/Z 00 T Type:	No. of Violations: 4-/ Time:
Waste Description: Powder Coat Waste	Waste Code:
Treatment: 🗌 Yes 🔀 No 💮 Type:	
Type of Storage: ☒ Containers ☐ Tanks ☐ Piles	☐ Impoundments
Disposition: Destination Facility	•
Location:	Type:
Amount Generated:	
7 mount donorated.	
Waste Description:	Waste Code:
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles	☐ Impoundments
	i de la companya de
Disposition: Destination Facility	
Location:	
Amount Generated:	ib./mo.
Waste Description:	Waste Code:
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles	☐ Impoundments
Disposition: Destination Facility	
Location:	Type:
Amount Generated:	lb./mo.
Waste Description:	Waste Code:
Treatment: Yes No Type:	
Type of Storage: Containers Tanks Piles	☐ Impoundments
Disposition: Destination Facility	
Location:	
Amount Generated:	

ID March an	
Date 4-14-7005	

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

	STA	TUS				CHARTER	LINE
1	2	3	4	GENERAL REQUIREMENTS COMME		CHAPTER CITATION	ITEM
		X		Designated facility: valid permit? Permit Number (PA)		287.6	1
				Biennial report submitted by March 1 of each odd numbered year.		287.52(a)	2
		X		Written source reduction strategy on file and in effect.		287.53	3
		X		Waste reduction strategy covers all waste streams.		287.53(b)	4
		X		Reduction strategy updated every five years or when waste or manufacturing process changes.		287.53(c)	5
П				Waste analysis performed: copy on file.	П	287.54	6
		风		Annual analysis or certification of waste submitted to Department and designated facility.		287.54(b)(f)	7
		K		Chemical analysis updated every five years or when waste or manufacturing process changes.		287.54(g)	8
П	\Box	X		Generator record keeping requirements.	П	287.55	9
H	Ħ	X	П	Operation of disposal or processing facility without a permit.	Ħ	287.101(a)	10
	-	سر		STORAGE REQUIREMENTS			
		K		Residual waste not mixed with hazardous waste.		299.111(1)	11
		X		Waste stored as not to create a safety risk.		299.111(2)	12
		团		Residual waste not mixed with special handling waste.		299.111(3)	13
		X				299.111(4)	14
T				Storage area inspected; records available. See "Pomment" # 8	X	299.112(c)	15
				All waste stored less than one year.		299.113(a)	16
T	I	X		Equipment maintained in operable condition.		299.114(a)	17
H		X		Equipment cleaning frequencies maintained.		299.114(c)	18
П		M	一	Vectors controlled and minimized.		299.115	19
		Ø		Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.		299.116(a)(b)	20
		M	\sqcap	Waste stored to prevent groundwater degradation.		299.116(c)	21
		X	+==	Sufficient number of properly constructed storage containers.		299.121	22
				Storage containers labeled properly. (om ments # 6	X	299.121(d)	23
		M	╽▛	Storage container height and access requirements.		299.121(e)	24
			17	Storage tank design standards.		299.122	25
	Π		ıH	Storage tanks labeled properly.		299.122(a)	26
	X			No putrescible waste or liquid waste stored in piles.		299.112(d), 299.131(b)	27
				Waste storage pile area properly designed, constructed and maintained.		299.131	28
				Storage pad or liner system properly designed and maintained.		299.132	29
				Proper design and maintenance of leachate and runoff control systems.		299.133	30
	ΠĀ			Proper storage and containment of incinerator ash residue.		299.151	31
	ΠÑ			Proper storage and containment of friable asbestos containing waste.		299.152	32
F	IX			Proper storage and containment of coal ash.		299.153	33
	İΚ			Proper storage and containment of PCB containing waste material.		299.154	34
	ΠŔ	╢		Proper storage of whole and processed tires.		299.155	35_
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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

Date of inspection 4-14-20	005	_ Identification Number _	PAD 0	02498632
Company/Facility/Site Name	Spra-Fin, Inc.			·····
Introduction				•
On this date, Charlie Fees conducte	ed a hazardous and residua	l waste generator inspection	ı .	
This inspection was the result of a were found to be in poor condition	notification by the EPA of , with odors and some leak	a discovery of many contaiing reported.	ners of	wastes and products that
The EPA lists Spra-Fin, Inc. as a sr	mall quantity generator (SC	QG) of hazardous wastes.		
Inspection				
I arrived at the site at 1:30 pm. The Upper Gwynedd Twp. At the site,	e Spra-Fin Company is loc I met the following person	ated between Wissahickon as:	Ave. and	the railroad tracks, in
Nicolas Brescia EPA on-scene of Frank Shimer worker for Spra	emergency coordinator a-Fin/Montgomery Powder	Coat Co.		
Also present were two technicians	from an EPA contacting fi	rm.		
I learned that spray paint activities At time of today's incident and inst there are only 1 or 2 workers remain	pection, the plant was large	ely inactive. That is, the tw	o (2) pa	int lines are idle, and
We conducted a survey of the various products were found at several local storage pen, and inside the plant its	ations throughout the prope	d products present at this fa erty. This included two (2)	cility. (trailers,	Containers of wastes and a shed, an outdoor
(Results on next page)				
notification of any violations observed dur herein, or other violations identified as a res This report does not constitute a imply immunity from legal action for any vio	ring the inspection. Additional result of review of laboratory analys or order or other appealable actionation noted herein. Wed does not necessarily imply or other appealable.	conducted by a representative on the conducted by a representative of notification of violations may be is es or Department records. In of the Department. Nothing concurrence with the findings on the concurrence with the findings on the conducted the con	ssued con ained her	ein shall be deemed to grant or
Person interviewed (signature)	 		Date _	
Inspector (signature)	en f. fels		Date _	4-14-05
	/			Page G of g

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

Date of inspection 4-14-2005	Identification Number PAD 002498632
Company/Facility/Site NameSpra-Fin,	Inc.
(Inspection, continued)	
The following wastes and products were observed:	
Wastes observed	Location
 Seven (7) blue, metal 55-gallon drums marked with faded "hazardous waste" labels 	Outdoor storage pen east of the plant
 Sixty-nine (69) blue metal drums which were unmarked. 	دد »
Approx. 250 cans of paints, enamels, catalysts, and related substances, ranging in volume from 1 to 5 gallons. Some of these displayed "flamm labels or hazard diamonds. This trailer emanate paint and solvent odor. Many of these container rusted, and the contents of some containers had past the lid, and spilled on the trailer floor. The former products; none displayed waste labels.	A long, white trailer behind the ed a plant, near the railroad tracks. The rear doors of the trailer were marked "flammable liquids"
Approx. 50 containers ranging from 1 to 5 galler. As well as two (2) 55-gallon drums. There were three 5-gallon containers with no lids and containers. These containers stored chemicals similar to those described in the preceding ground.	re of and east of the plant (near trees) aining
■ A large box containing a grayish paint sludge	" "
A blue plastic 55-gallon drum marked with the "chryscoat" and a label indicating hydrofluoric phosphoric acids, as well as diethylene glucol	: & Inside the plant
notification of any violations observed during the inspection. A herein, or other violations identified as a result of review of laborat This report does not constitute an order or other appea imply immunity from legal action for any violation noted herein.	lable action of the Department. Nothing contained herein shall be deemed to grant ourily imply concurrence with the findings on this report, but does acknowledge that the
Person interviewed (signature)	Date 5-3-0

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

Date of inspection	4-14-2005		_ Identification Number	PAD 0	02498632	
Company/Facility/Site	Name	Spra-Fin, Inc.				
(Inspection, continued)					
The conditions observed	d in the precedin	g section are in viola	tion of the following EPA a	ınd state	e regulations.	
40 CFR 262.12 40 CFR 262.34(a) 40 CFR 262.34(a)(4) 40 CFR 265.171 40 CFR 265.173(a) 40 CFR 265.173(b) 40 CFR 265.174 40 CFR 262.34(a) 40 CFR 262.34(a) 50 CFR 262.34(a) 40 CFR 262.34(a) 40 CFR 262.34(a) 40 CFR 262.34(a) 40 CFR 262.34(a) 40 CFR 262.34(a) 40 CFR 262.34(a)	"Generator was "Preparedness, "Containers of "Containers ma "Container stor "Containers ma "Containers ma		tept closed" ks" weekly" ulation date"	ed and	implemented"	
After we had surveyed to Powder Coatings", the	the wastes and classister company to	hemicals, Mr. George o Spra-Fin, Inc.	e Chittenden joined us. He	is the pr	resident of "Mo	ontgomery
lines in May, 2004. The lines in the future. Mr.	is North Wales p Chittenden adm	plant is now being use itted that the wastes h	site since 1963. This comp ed as a warehouse, with pos have been on this site for low ave been on site for well over	sible pla	ans to restart the n 1 year and the	ne paint
disposing of its outdate	d and unusable perated by the Spi	products. However, a	eident, his company had been to time of inspection, he was e failure to provide evidence	unable	to provide any	receipts of
40 CFR 262.20(a)	"Manifest pro	epared as required	,,			
notification of any violations herein, or other violations ide This report does no imply immunity from legal ac	observed during the ntified as a result of ot constitute an order tion for any violation erson interviewed do or that a copy was leading to the copy w	ne inspection. Additional review of laboratory analyser or other appealable action noted herein. oes not necessarily imply	n conducted by a representative notification of violations may be ses or Department records. on of the Department. Nothing co-concurrence with the findings on	issued co	onceming either verein shall be deer	iolations noted ned to grant or wledge that the

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

Date of inspection 4-14-2005	Identification Number PAD 002498632
Company/Facility/Site NameSpra-Fin, Inc.	
(Inspection, continued)	
Mr. Chittenden said that the waste disposal shipping manifests prior date, and that he will try to locate them as soon as possib	
Nick Brescia of the EPA directed Mr. Chittenden to contract a waste characterization process of the many wastes, which Spra services representative from Philip Services, Inc. arrived to proflammable nature of many of the wastes, the EPA directed the place them inside the building.	a-Fin needs to ship offsite for r disposal. At 4:00 pm, a povide an estimate for waste removal. Because of the
Mr. Chittenden said he would contact me when the waste ship	ping manifests have been located.
I left the site at 4:30 pm.	
Summary and Conclusion	
In summary, the Spra-Fin Company is in violation of the all th	e regulations cited on the preceding page.
It is recommended that the Spra-fin Company continue the propurpose of characterizing its solid wastes, and then disposing	
notification of any violations observed during the inspection. Additional n herein, or other violations identified as a result of review of laboratory analyses. This report does not constitute an order or other appealable action imply immunity from legal action for any violation noted herein.	
Person interviewed (signature)	Date 5.3 - 05
inspector (signature)	Date 4-14-05
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		-



U.S. Environmental Protection Agency **Resource Conservation and Recovery Act** (RCRAInfo)

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GO

EPA Home > Envirofacts > RCRAInfo > Query Results





Consolidated facility information (from multiple EPA systems) was searched to select facilities

Handler ID: Beginning With: pad002498632

Results are based on data extracted on APR-09-2005

Note: Click on the underlined CORPORATE LINK value for links to that company's environmental web pages. Click on the underlined MAPPING INFO value to obtain mapping information for the facility.

Go To Bottom Of The Page

HANDLER NAME: SPRA FIN INC

HANDLER ID:

PAD002498632

STREET:

RCRAInto

177 WISSAHICKON AVE FACILITY INFORMATION: View Facility Information

CITY: STATE: **NORTH WALES**

CORPORATE LINK: COUNTY:

MONTGOMERY

ZIP CODE:

194540000

MAPPING INFO:

MAP

EPA REGION:

PA

CONTACT INFORMATION

NAME	STREET	CITY	STATE	ZIP CODE	PHONE	TYPE OF CONTACT
1		NORTH WALES	РА	19454	2156999238	Public

HANDLER / FACILITY CLASSIFICATION

HANDLER TYPE Small Generator
Small Generator

Go To Top Of The Page

Total Number of Facilities Displayed: 1

•	*		